

# Exhibit A

Victor Careaga  
August 10, 2023

UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF FLORIDA

CASE NO.: 22-MC-21115-JAL

IN RE MATTER OF THE EX PARTE APPLICATION OF THE RENCO  
GROUP INC. AND THE DOE RUN RESOURCES CORPORATION FOR AN  
ORDER TO TAKE DISCOVERY PURSUANT TO 28 U.S.C. § 1782

Applicants.

VIDEOTAPED DEPOSITION OF VICTOR CAREAGA

Thursday, August 10, 2023  
10:03 a.m. - 4:05 p.m.

2525 Ponce de Leon Boulevard  
Suite 1000  
Coral Gables, Florida 33134

Stenographically Reported By:  
LAURIE K. BELLE

Victor Careaga  
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BY: FRANCISCO RODRIGUEZ, ESQUIRE

Also Present:

John Weiss (via Zoom)  
Crystal Saling (via Zoom)  
Tania Bedit, Guidepost Solutions  
Raul Torres, videographer

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\*\* All exhibits were retained by Mr. Kuntz.

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STATEMENT TO BE MARKED

At the time of the taking the deposition, Mr. Francisco Rodriguez made a statement on the record and was asked to be marked for the record by Mr. Kuntz:

PAGE: 74.

LINES: 13-19.

STATEMENT: BY MR. RODRIGUEZ: You can strike whatever you want. Let me just finish my statement.

Careaga was a 1099 employee of the Rodriguez Tramont firm. He was an independent contractor. To characterize it as an employee -- I'm not sure that is accurate, but he worked for Rodriguez Tramont as a 1099 independent contractor.

A handwritten signature in cursive script that reads "Laurie K. Belle". The signature is written in black ink and is positioned above a horizontal line.

LAURIE K. BELLE, Stenographer

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1 Deposition taken before LAURIE K. BELLE, Stenographer  
2 and Notary Public in and for the State of Florida at  
3 Large, in the above cause.

4 -----

5 THE VIDEOGRAPHER: Today is August 10, 2023.  
6 The time is 10:03 a.m.

7 We are here for the deposition of Victor  
8 Careaga.

9 Would all counsel please state their  
10 appearance for the record.

11 MR. KUNTZ: Good morning.

12 My name is Robert Kuntz with the law firm of  
13 Rivero Mestre, LLP. With me is Meagan Nicholson,  
14 also an attorney with our firm. Seated at the  
15 table with us is Tania Benedit.

16 MS. BENEDIT: Correct.

17 MR. RODRIGUEZ: My name is Frank R. Rodriguez.  
18 I'm with the law firm of Rodriguez Tramont & Nunez,  
19 and I represent the intervenors, Rodriguez Tramont  
20 & Nunez and Napoli Shkolnik.

21 MR. HALPREN: My name is Jay Halpren. I am  
22 here on behalf of Halpren Santos & Pinkert as an  
23 intervenor in this matter.

24 MR. KUNTZ: Those are all of the appearances  
25 by counsel. I don't know if -- so.



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1 THE WITNESS: I'm Victor Careaga. I am the  
2 deponent.

3 THE COURT REPORTER: I'm going to swear the  
4 witness in. Okay.

5 Sir, please raise your right hand.

6 Do you swear or affirm the testimony you're  
7 about to give will be the whole truth and nothing  
8 but the truth?

9 THE WITNESS: I do.

10 DIRECT EXAMINATION

11 BY MR. KUNTZ:

12 Q. Good morning, Mr. Careaga.

13 Would you tell us your full name, and  
14 especially so I can hear how you pronounce your last  
15 name and try to give you the respect of getting it  
16 right.

17 A. Before I even answer the question about my  
18 name, Mr. Kuntz, I'm going to say good morning to  
19 everybody, and I'm here fulfilling my obligation to  
20 attend the deposition pursuant to the 1782 application  
21 that has been filed by your clients.

22 Before I answer, I must state on the record  
23 that there are events that have come to light most  
24 recently and information I have confirmed even more  
25 recently that Judges Lenard and Judge Louis must be

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1 apprised of and so that the parties in this proceedings  
2 are also made aware of.

3 We all know that an application --

4 Q. Mr. Careaga, the question was, would you state  
5 your name.

6 A. I'm not going to answer my name until I give a  
7 statement on the record, Mr. Kuntz.

8 Q. If you would just state your name, I'll go  
9 ahead and let you make whatever statement you want on  
10 the record.

11 A. Fair enough.

12 Victor Armando Careaga, C-A-R-E-A-G-A.

13 Q. Go ahead and make your statement, Mr. Careaga.

14 A. Yes.

15 We all know that an application to subpoena my  
16 testimony was filed last year in 2022. And we all  
17 appeared in open court at a hearing before Judge --  
18 Judge Magistrate Louis on or about July 13th at which  
19 time I agreed to be deposed this month. I knew nothing  
20 then about the events that have come about and the  
21 information that I now share with you.

22 On July 31st your clients filed pleadings, not  
23 here in Southern District Court, but in the Eastern  
24 District of Missouri. Pleadings in the form of motions  
25 for sanctions and for remedial measures. In support of

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1 those motions, there was an RM report, and for all  
2 intents and purposes, the prosecutor's report out of  
3 Peru, and these proceedings are related. This is a 1782  
4 in aid of proceedings in Peru, and that is why this is  
5 so relevant. Okay.

6 I have been named as a result of that official  
7 investigation as to one of 12 individuals who are facing  
8 criminal prosecution in the country of Peru. Upon  
9 learning of this only ten days ago, based upon your  
10 filing in the Eastern District, I hurried and sought the  
11 advice of Peruvian counsel specializing in the defense  
12 involving criminal organizations. I obtained such  
13 advice only 48 hours ago.

14 What did I learn? I learned that all sides  
15 point to the fact that apparently I'm a named defendant  
16 by the Peruvian prosecutors as of June 27th of this  
17 year, and that I'm facing charges, criminal charges,  
18 which carry sentences in a significant number of years.  
19 I've also learned that because of this, I have  
20 constitutional rights and privileges that are afforded  
21 to me under Peruvian law, very similar to the rules that  
22 the United States Constitution afford to the right to  
23 remain silent, the right to counsel, the right to be  
24 notified of the nature of the proceedings and charges  
25 against me.

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1           That has never happened since your clients  
2   instituted the proceedings back in January of 2021. I  
3   have received no official notification from the Peruvian  
4   authorities since it's a judicial criminal process that  
5   have began effective June 27th of the -- whether I am  
6   indeed a defendant, I have received no official  
7   confirmation of that. I have learned that of my  
8   auspices, and I have no idea of what the exact nature of  
9   the charges are.

10           And the last thing that I learned was the  
11   Peruvian authorities have not complied with any  
12   procedural remedy in order to afford me notice of the  
13   criminal charges that have been levied against me in the  
14   country of Peru. In light of this judicial reality,  
15   I've been -- I have been advised in the strongest  
16   language possible to refrain from being questioned until  
17   such time I have -- as I have been advised by the  
18   Peruvian authorities of the charges that are leveled  
19   against me.

20           In conclusion, I stand ready, willing, and  
21   able to be deposed in the future after the Peruvian  
22   authorities have complied with their obligations and  
23   afforded me the constitutional rights and privileges  
24   which I'm entitled to under Peruvian law. For all of  
25   these reasons, I will refrain from answering any

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1 questions today.

2 Q. Okay. So the way that this is going to work  
3 is I'm going to ask you the questions. You can refrain  
4 from answering anything you want to refrain from  
5 answering.

6 Are you represented by counsel here today?

7 A. No, I'm not.

8 Q. What's your work address?

9 A. I am going to refrain from answering any  
10 further questions today, Mr. Kuntz. You can ask  
11 questions if you'd like to, but I'm going to refrain  
12 under the advise of counsel not to do so.

13 Q. I understand, that's how we are going to  
14 proceed. And what we can do to make that more efficient  
15 is I will just assume and the record reflect that  
16 everything you tell me you're refraining from answering  
17 a question, you're refraining based on the -- everything  
18 that you have said to this point.

19 Fair enough?

20 A. That is correct.

21 Q. Okay. Have you ever been deposed before?

22 A. I will not be answering any questions here  
23 today, Mr. Kuntz.

24 Q. When you were an attorney, did you ever  
25 conduct a deposition?

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1           A.     I will continue to assert the answers I have  
2     been given, I refrain from answering.

3           Q.     Okay. Let me show what we've marked as  
4     Exhibit 1.

5           (Thereupon, Notice of Taking Videotaped  
6     Deposition Duces Tecum was marked as Exhibit  
7     Number 1 for identification.)

8           MR. KUNTZ: Thank you.

9           And we've got a copy for counsel and for the  
10     witness and -- give the witness a copy first. And  
11     for the court reporter.

12    BY MR. KUNTZ:

13           Q.     Sir, have you ever seen Exhibit 1 before?

14           A.     I continue to refrain from answering any  
15     questions here today.

16           Q.     The exhibit is a notice and subpoena for  
17     deposition duces tecum and it calls for documents to be  
18     produced. Would you please tell me everything you did  
19     to search for, collect, and produce those documents.

20           A.     Same answer, Madam Court Reporter.

21           Q.     Did you bring any additional documents with  
22     you today?

23           A.     The same answer.

24           Q.     Were the five PDFs consisting of 100 pages, 82  
25     of which were blank forms that you provided to us on

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1 August 4th, is that the -- is that the sum total of what  
2 you intend to produce in response to this subpoena?

3 A. I continue to refrain from answering,  
4 Mr. Kuntz.

5 Q. Were you present at Judge Louis' hearings on  
6 June 15th, July 13th, and July 31st?

7 A. I continue -- I continue to refrain.

8 Q. Do you recall Judge Louis' -- Judge Louis'  
9 orders regarding the process for production of documents  
10 with respect to Exhibit 1?

11 A. Same response, Madam Court Reporter.

12 Q. Do you recall -- how did you locate documents  
13 that might be responsive to Exhibit 1?

14 A. Same response.

15 Q. How did you decide among everything that you  
16 located that might be responsive what was responsive?

17 A. Same response, Madam Court Reporter.

18 Q. Do you recall telling Judge Louis during one  
19 of the hearings that you used key words to search for  
20 responsive documents?

21 A. Some continuing response, Madam Court  
22 Reporter.

23 Q. What key words did you use?

24 A. Same response.

25 Q. Okay. Did you ask for the assistance of

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1 anyone to make the determination of what documents were  
2 responsive to the subpoena?

3 A. Same response.

4 Q. If you asked for assistance, of whom did you  
5 ask assistance?

6 A. Same response, Madam Court Reporter.

7 Q. How did they assist you?

8 A. Same response.

9 Q. Did you exchange e-mails with any of the  
10 people who were assisting you with your response to the  
11 subpoena?

12 A. Same response.

13 Q. Did you -- how many -- were you able to locate  
14 e-mails that you felt were responsive to the subpoena?

15 A. Same response.

16 Q. How many of the e-mails that you located that  
17 were responsive to the subpoena did you provide to the  
18 Rodriguez Tramont firm for privilege review?

19 A. Same response, sir.

20 Q. When did you provide them?

21 A. Same response.

22 Q. How many e-mails did you provide -- how many  
23 potentially -- strike that.

24 How many e-mails did you deem responsive did  
25 you provide to Jay Halpren's firm or --



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1 A. Same response.

2 Q. This will be tedious no matter what we do, but  
3 it will be a little more efficient if you let me finish  
4 my question.

5 A. I will.

6 I apologize for that.

7 Q. Thank you.

8 How many e-mails did you deem responsive did  
9 you provide to the Jay Halpren firm for privilege  
10 review?

11 A. Same response, please.

12 Q. And when did you do that?

13 A. Same response.

14 Q. How many hard copy documents did you find that  
15 you deemed were responsive to the subpoena?

16 A. For purposes of the record, I am still  
17 continuing to refer when I say the same response of the  
18 statement that I laid out at the beginning of this  
19 deposition.

20 Q. Right.

21 And to be clear, your basis for not responding  
22 are the protections of Peruvian criminal code; is that  
23 correct?

24 A. The Peruvian Constitution --

25 Q. Peruvian Constitution.

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1 A. -- and any other laws that I may become aware  
2 of.

3 Q. Okay. So you are -- all of these same  
4 responses, decline to answer, they're all predicated in  
5 your understanding on protections afforded to you in the  
6 Peruvian Constitution?

7 A. As I said in my statement.

8 Q. Got it.

9 I may have asked this, lose track. Did you  
10 locate any hard-copy documents that you believed were  
11 responsive to the subpoena?

12 A. Same continuing response.

13 Q. If you did, how many of those were there?

14 A. Same continuing response.

15 Q. How many hard copies of documents you deemed  
16 responsive to the subpoena did you provide to the  
17 Rodriguez firm for privilege review?

18 A. Same continuing response.

19 Q. How many to the Halpren -- Halpren firm for  
20 the same purpose?

21 A. Same response.

22 Q. Okay. Did you ever e-mail Mr. Rodriguez or  
23 anyone at the Rodriguez firm with regard to production  
24 of documents under this subpoena?

25 A. Same response, Madam Court Reporter.

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1 Q. Did you ever e-mail anyone at the Halpren firm  
2 or the Schlichter Board firm with response to -- with  
3 regard to production under the subpoena?

4 A. Same response.

5 Q. Okay. If you sent documents and e-mails to  
6 Mr. Rodriguez and to Mr. Schlichter's firm, did you  
7 send -- did you segregate them or did everybody get all  
8 the same thing?

9 A. Same response.

10 Q. Okay. When you -- if you transmitted e-mails  
11 to Mr. Rodriguez' firm for privilege review, did you  
12 ensure that those e-mails retain their metadata?

13 A. Same response.

14 Q. Same question with regard to anything -- any  
15 e-mails transmitted to the Halpren?

16 A. Same answer, Madam Court Reporter.

17 Q. Did you organize your production to be made as  
18 the docs are held in the normal course of business -- as  
19 the documents are held in the normal course of business?

20 A. Same response.

21 Q. Did you put them into responsive categories?

22 A. I continue to refer to my statement at outset  
23 of this deposition.

24 Q. Did anyone assist you in determining how the  
25 documents that you produced should be produced?

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1 A. Same response.

2 Q. How do you account for having told Judge Louis  
3 that there was as many as 10,000 e-mails that could be  
4 responsive to this subpoena and the fact that there are  
5 not 10,000 e-mails accounted for in either the privilege  
6 logs or your production?

7 A. Same continuing response.

8 Q. Likewise, with respect to documents, you told  
9 Judge Louis there were hundreds of documents. At one  
10 point I believe you said there -- it's many three -- as  
11 many as three banker boxes of documents. How do you  
12 account for the difference between that number of  
13 documents and the number of documents both produced and  
14 reflective on the privilege log?

15 A. Same continuing response.

16 Q. In the June -- in the June hearing before  
17 Judge Louis, which occurred on June 15th, you were  
18 present at that hearing, weren't you?

19 A. Same continuing response.

20 Q. And at that hearing I discussed the  
21 formalization by the public prosecutor in Peru in which  
22 you have been named as a defendant, didn't I?

23 A. Same continuing response, Madam Court  
24 Reporter.

25 Q. Your hearing and perception are sufficient

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1 that sitting in the courtroom on June 15th when I  
2 discussed the formalization by the Peruvian prosecutor  
3 you heard me, didn't you?

4 A. Same continuing response.

5 Q. How do you square having been present at that  
6 hearing in which the formalization was discussed with  
7 your statement at the outset of this deposition that you  
8 only learned of the formalization ten days ago?

9 A. Same continuing response.

10 Q. If you learned of the formalization ten days  
11 ago and you only spoke to counsel about it 48 hours ago,  
12 why did you wait eight days after finding out that you  
13 were charged with what you have described as a serious  
14 crime to seek legal advice?

15 A. Same continuing response.

16 Q. When did you graduate law school?

17 A. Same continuing response.

18 Q. Where are you currently employed?

19 A. Same continuing response.

20 Q. For how many years have you been employed with  
21 current employer Rodriguez Tramont?

22 A. Same continuing response, Madam Court  
23 Reporter.

24 MR. RODRIGUEZ: I'm going to object to that.

25 He's not an -- mischaracterizes. He's not an

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1 employee of Rodriguez Tramont & Nunez.

2 MR. KUNTZ: So, Mr. Rodriguez, you're here as  
3 an intervener.

4 MR. RODRIGUEZ: Right.

5 MR. KUNTZ: First of all, as I'm sure you're  
6 aware, the rules locally do not permit speaking  
7 objections of any sort. That was certainly a  
8 speaking objection --

9 MR. RODRIGUEZ: Yeah.

10 MR. KUNTZ: -- so I'd ask you to refrain, if  
11 you can, from making speaking objections.

12 MR. RODRIGUEZ: I'm just stating --

13 MR. KUNTZ: Furthermore --

14 MR. RODRIGUEZ: I'm just correcting the  
15 record. He's not an employee of Rodriguez  
16 Tramont & Nunez.

17 MR. KUNTZ: Furthermore -- furthermore, you're  
18 here as an intervener.

19 MR. RODRIGUEZ: Right.

20 MR. KUNTZ: So I'll ask you even to restrict  
21 your objections to form to those objections that  
22 belong to you as an intervener.

23 Thank you.

24 BY MR. KUNTZ:

25 Q. Were you ever employed by -- whenever you were

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1 employed by the Rodriguez Tramont firm --

2 MR. KUNTZ: Tramont? Tramont?

3 MR. RODRIGUEZ: Tramont.

4 BY MR. KUNTZ:

5 Q. Whenever you were employed by the Rodriguez  
6 Tramont firm, what were your duties?

7 A. Same continuing response.

8 Q. Did you ever work for the Napoli Shkolnik  
9 firm?

10 A. Same continuing response, sir.

11 Q. If you ever did, for what years?

12 A. Same continuing response.

13 Q. Who were your supervisors during your term of  
14 employment with Rodriguez Tramont?

15 A. Same continuing response, Madam Court  
16 Reporter.

17 Q. Who were your supervisors, if you were  
18 employed by Napoli Shkolnik at Napoli Shkolnik?

19 A. Same response.

20 Q. Did you ever work for the Schlichter Bogard &  
21 Denton law firm?

22 A. Same continuing response.

23 Q. If so, what year?

24 A. Same continuing response, sir.

25 Q. If so, what duties?

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1 A. Same answer.

2 Q. If so, who were your supervisors?

3 A. Same response.

4 Q. Do you know a man named Jay Schlichter?

5 A. Same response, sir.

6 Q. Do you know someone named Kris Kraft --

7 Kristina Kraft?

8 A. Same response.

9 Q. Or it may be Kristine Kraft, but I believe she  
10 goes by Kris Kraft. Do you know her?

11 A. Same continuing response.

12 Q. Do you know someone named Beth Wilkins?

13 A. Same continuing response.

14 Q. Were you ever employed by Mr. Halpren's law  
15 firm?

16 A. Same continuing response.

17 Q. If so, for what years?

18 A. Same continuing response.

19 Q. If so, what's your title?

20 A. Same continuing response.

21 Q. If so, what were your duties?

22 A. Continuing response.

23 Q. Mr. Halpren's firm terminated you when you  
24 were disbarred by the Florida Bar; isn't that correct?

25 A. Same continuing response.



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1 Q. Okay. Tell me everyone by whom you were  
2 employed during your time as a licensed attorney.

3 A. Same continuing response, sir.

4 Q. Where did you go to undergraduate?

5 A. Same continuing response.

6 Q. Please tell me how all of your employment up  
7 to your entry into law school.

8 A. Same continuing response.

9 MR. KUNTZ: Exhibit 2.

10 (Thereupon, Petition for Disciplinary Revocation  
11 without Leave to Apply for Readmission was  
12 marked as Exhibit Number 2 for identification.)

13 BY MR. KUNTZ:

14 Q. I'm showing the witness now Exhibit 2.

15 Sir, would you look at Exhibit 2, please.

16 A. I'm familiar with the document.

17 Q. Thank you.

18 And what is that document?

19 A. Same continuing response.

20 Q. But you are familiar with?

21 A. Same continuing response.

22 Q. Okay. You were -- you petitioned for a  
23 disciplinary revocation without leave to apply for  
24 readmission in May of 2013, didn't you?

25 A. Same continuing response.

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1 Q. Since that revocation -- no.

2 Strike that.

3 Let's do Exhibit 3 first.

4 (Thereupon, Permanent Disbarment of Consent was  
5 marked as Exhibit Number 3 for identification.)

6 BY MR. KUNTZ:

7 Q. Are you familiar with Exhibit 3, Mr. Careaga?

8 A. Same continuing response.

9 Q. That is your permanent disbarment on consent  
10 from the Florida Bar in 2015, correct?

11 A. Same continuing response.

12 Q. Okay. Since your revocation -- since the  
13 revocation and disbarment have you continued to work for  
14 law offices?

15 A. Same continuing response.

16 Q. For what -- were you ever employed by the  
17 Louis Thaler law firm?

18 A. Same continuing response.

19 Q. If so, for how long?

20 A. Same continuing response.

21 Q. Okay. Very good.

22 MR. KUNTZ: We're going to take a very brief  
23 break, and then we'll be right back.

24 THE VIDEOGRAPHER: Off record 10:22 a.m.

25 (There was a discussion off of the record.)

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1 THE VIDEOGRAPHER: On record 10:29 a.m.

2 BY MR. KUNTZ:

3 Q. Mr. Careaga, Exhibits 2 and 3 are public  
4 records. Can you tell me how answering questions about  
5 these documents would implicate your prosecution in  
6 Peru?

7 A. Same continuing response, Madam Court  
8 Reporter.

9 Q. I'm mean, that's your signature on Exhibit 3,  
10 isn't it?

11 A. Same continuing response.

12 Q. When you were employed by the Rodriguez  
13 Tramont firm, were you paid by the hour or on a salary  
14 basis?

15 A. Same continuing response.

16 Q. Did you receive a bonus above your base for  
17 performance?

18 A. Same continuing response.

19 Q. You're aware that there are lawsuits underway  
20 in two courts of the Eastern District of Missouri by  
21 Peruvian nationals claiming to have been injured by Doe  
22 Run and Renco, correct?

23 A. Same continuing response.

24 Q. Okay. As you sit here today, are you entitled  
25 to any part of any eventual recovery in those actions?

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1 A. Same continuing response, sir.

2 Q. How long were you a licensed attorney?

3 A. Same continuing response.

4 Q. How would you character differences -- strike  
5 that.

6 You traveled frequently to Peru during your  
7 time as an attorney and since your disbarment, didn't  
8 you?

9 A. Same continuing response.

10 Q. You're familiar with the practice of law in  
11 Peru?

12 A. Same continuing response, sir.

13 Q. How you would characterize the differences  
14 between the practice of law in Peru and the practice of  
15 law in the United States?

16 A. Same response.

17 Q. Do you have Peruvian counsel?

18 A. Same continuing response.

19 Q. Okay. Let me show you Exhibit 4.

20 (Thereupon, Affidavit of Victor Careaga was  
21 marked as Exhibit Number 4 for identification.)

22 BY MR. KUNTZ:

23 Q. Sir, do you recognize Exhibit 4?

24 A. Same continuing response.

25 Q. Sir, that's your own affidavit, isn't it?

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1 A. Same continuing response.

2 Q. You filed that affidavit under oath, didn't  
3 you?

4 A. Same continuing response, Madam Court  
5 Reporter.

6 Q. So you swore when you signed on the bottom of  
7 page -- of the last page of this affidavit, you swore  
8 that everything in it was true, didn't you?

9 A. Same response.

10 Q. And you filed that on August -- that affidavit  
11 was submitted on August 4th of this year in this matter,  
12 wasn't it?

13 A. Same response, sir.

14 Q. Okay. Were you telling the truth when you  
15 said that "At all times material hereto, this affiant  
16 acted in the capacity of co-counsel or acted as  
17 consultant/paralegal for certain law firms who are  
18 representing Peruvian clients in existing Missouri  
19 litigation?

20 A. Same continuing response.

21 Q. Take a look at paragraph 9 of Exhibit 4.

22 Thank you.

23 This is your affidavit signed by you. So why  
24 don't you go ahead and read paragraph 9 for us.

25 A. Same continuing response, sir.

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1 Q. You don't want to even read your sworn  
2 statement?

3 A. Same response.

4 Q. Can you tell me how reading a statement to  
5 which you've already sworn and which has already been  
6 submitted as evidence in this matter would implicate  
7 your concerns about Peruvian prosecution?

8 A. Same continuing response.

9 Q. Okay. Paragraph 10 says that you co-counseled  
10 with Schlichter Bogard & Denton starting at the end of  
11 2006, doesn't it?

12 A. Same continuing response, sir.

13 Q. I mean, that is what it says.

14 A. Same continuing response.

15 Q. Okay. And -- sorry about that.

16 So before when I asked you if you had worked  
17 with Schlichter Bogard & Denton and you declined to  
18 answer, the answer really should have been yes, correct?

19 A. I continue to refer to my statement at the  
20 outset of this deposition.

21 Q. Okay. Likewise, this declaration states that  
22 you were co-counsel with Jay Halpren, Esquire, correct?

23 A. Same continuing response.

24 Q. What's in this declaration is true?

25 A. Same continuing response, sir.

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1 Q. Okay. Take a look at paragraph 12 of the  
2 affidavit -- I keep calling it a declaration, it's an  
3 affidavit.

4 You wrote and signed this affidavit, do you  
5 want to read paragraph 12 for us?

6 A. Same continuing response.

7 Q. Okay. Paragraph 12 says in part that "by 2014  
8 you began working in the same capacity for the law firm  
9 of Rodriguez Tramont & Nunez, P.A."

10 So it's not a secret -- it's not only not a  
11 secret that you worked for Rodriguez, but you worked for  
12 Rodriguez Tramont, you swore to it, right?

13 A. Same continuing response, sir.

14 Q. Okay. Likewise, the Thaler firm, you swore  
15 that you worked for them?

16 A. Same response.

17 Q. Okay. Can you tell me in para- -- take a look  
18 at paragraph 13.

19 You don't want to read paragraph 13?

20 A. Same continuing response, sir. I'm giving you  
21 the courtesy of looking at the document. That's all.

22 Q. Okay. You wrote, "To this end I recruited  
23 La Oroya residents, believers in the cause behind the  
24 Missouri litigation, to assist with all the field work  
25 needed to be carried out by the ground team, hereinafter

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1 ground team, for them to meet with clients or potential  
2 clients on behalf of U.S. law firms."

3 Was that true when you wrote and swore to  
4 that?

5 A. Same response, Madam Court Reporter.

6 Q. So you recruited the ground team that would  
7 speak to potential clients on behalf of U.S. law firms,  
8 correct?

9 A. Same response, sir.

10 Q. And the U.S. law firms on whose behalf they  
11 spoke to, was that the Thaler firm?

12 A. Same response.

13 Q. That was the Thaler firm, right?

14 A. Same response, sir.

15 Q. It was also the Rodriguez firm, wasn't it?

16 A. Same response.

17 Q. It was also the Halpren firm?

18 A. Same response.

19 Q. It was also the Schlichter Bogard firm?

20 A. Same response, Madam Court Reporter.

21 Q. Take a look at paragraph 14.

22 You wrote and swore to that paragraph. Would  
23 you like to read it for us?

24 A. Same response, sir.

25 Q. Okay. It says that you "carried out any and



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1 all activities delegated to me which related to this  
2 case and followed the protocols laid down by the U.S.  
3 law firms."

4 The activities that were delegated to you that  
5 were delegated -- they were delegated to you by the  
6 Rodriguez firm, right?

7 A. Same response, sir.

8 Q. Sometimes they were delegated by the Thaler  
9 firm?

10 A. Same response.

11 Q. Were they -- they were sometimes delegated by  
12 the Halpren firm?

13 A. Same response, sir.

14 Q. They were sometimes delegated by the  
15 Schlichter Bogard firm?

16 A. Same continuing response.

17 Q. And when you refer to "protocols laid down by  
18 the U.S. law firms for the dealings with existing and  
19 potential clients," the law firms to which you refer are  
20 the Rodriguez firm, correct?

21 A. Same continuing response.

22 Q. And the Thaler firm?

23 A. Same continuing response.

24 Q. And the Halpren firm?

25 A. Same response, Madam Court Reporter.

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1 Q. And the Schlichter Bogard firm?

2 A. Same response.

3 Q. And those protocols were protocols that, among  
4 other things, included approaching potential clients?

5 A. Same response, sir.

6 Q. In person?

7 A. Same response.

8 Q. To solicit their involvement in the Missouri  
9 lawsuits; is that correct?

10 A. Same response.

11 Q. Now, in subparagraph (c) of paragraph 14, will  
12 you read sub 14(c)?

13 A. Same response.

14 Q. Okay. You wrote, "Coordinating through the  
15 ground team the procurement of signed documentation from  
16 clients, their parents or guardians of children who are  
17 plaintiffs in the litigation in order to comply with  
18 discovery procedures and court orders and obtain  
19 necessary documentation from schools and other higher  
20 institutes of learning, medical institutions, and  
21 employers."

22 You were in charge of doing all that document  
23 collecting, weren't you?

24 A. I continue to refer to my statement at the  
25 outset of this deposition.

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1 Q. And when doing that, as you stated at the  
2 beginning of this paragraph, you were working at the  
3 delegation of the four law firms that I mentioned,  
4 correct?

5 A. Same response, Madam Court Reporter.

6 Q. And you were operating at the delegation of  
7 those four law firms, according to protocols that they  
8 laid down, just as you stated, correct?

9 A. Same response, Madam Court Reporter.

10 Q. Subparagraph (d) of paragraph 14, you're not  
11 going to read that one either, are you?

12 A. Same response, Madam Court Reporter.

13 Q. Okay. You wrote that among your duties was  
14 "Paying the ground team for their work from funds  
15 provided to me by either LT or RTN."

16 And "LT" is previously defined as Louis  
17 Thaler. RTN is previously defined as Rodriguez  
18 Tramont & Nunez.

19 So that's what you did, right? You paid the  
20 ground team for their work, right?

21 A. Same continuing response.

22 Q. And the payments to the ground team, those  
23 came from funds provided by Mr. Rodriguez' firm and/or  
24 Mr. Thaler's firm, correct?

25 A. Same response.

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1 Q. You know what, that was a compound question.  
2 Let's make the record clear.

3 Some of the funds that were paid to the ground  
4 team for their work were provided to you by the  
5 Rodriguez firm, correct?

6 A. Same response.

7 Q. Some of the funds were provided by the Louise  
8 Thaler firm, correct?

9 A. Same continuing response.

10 Q. Subparagraph 14(e), do you want to look at  
11 that?

12 You're not going to read that paragraph, are  
13 you?

14 A. Same continuing response.

15 Q. Paragraph 14(e) says that part of your duties  
16 were "Coordinating and participating in trips to Peru  
17 with members of the U.S. law firms that would meet with  
18 existing or potential clients."

19 So you traveled -- you participated in trips  
20 to Peru with Mr. Rodriguez, didn't you?

21 A. Same continuing response.

22 Q. You participated in trips to Peru with  
23 Mr. Shkolnik, didn't you?

24 A. Same answer.

25 MR. KUNTZ: It's S-H-K-O-L-N-I-K.

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1 BY MR. KUNTZ:

2 Q. You participated in trips to -- did you -- you  
3 participated in trips to Peru with Thaler, didn't you?

4 A. Same response, sir.

5 Q. Participated in trips to Peru with  
6 Mr. Halpren?

7 A. Same response, sir.

8 Q. How about anyone from the Schlichter Bogard  
9 firm? Did you participate in trips to Peru with them?

10 A. Same response.

11 Q. You did, didn't you?

12 A. Same response, Madam Court Reporter.

13 Q. And when you were there on all of those trips,  
14 part of the job was to meet with potential clients,  
15 correct?

16 A. Same response.

17 Q. And to meet with them in person, correct?

18 A. Same response, sir.

19 Q. To see if they wanted to be involved in the  
20 U.S. -- the U.S. lawsuits being carried out in the  
21 Eastern District of Missouri, correct?

22 A. Same continuing response.

23 Q. In fact, you were in charge of the ground  
24 team, weren't you?

25 A. Same continuing response, sir.

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1 Q. You were the boss?

2 A. Same continuing response.

3 Q. And your boss from 2014 on was Frank

4 Rodriguez, wasn't it?

5 A. Same continuing response.

6 Q. And prior to that, your boss was Louis Thaler?

7 A. Same continuing response, sir.

8 Q. I needed a "wasn't it."

9 Prior that your boss was Louis Thaler, wasn't  
10 it?

11 A. Same continuing response.

12 Q. And before that you worked with, while you  
13 were still an attorney, Mr. Halpren?

14 A. Same continuing response.

15 Q. Okay. During your trips to South America,  
16 you've heard attorneys referred to by Spanish speakers  
17 by the honorific doctor, correct?

18 A. Same continuing response, sir.

19 Q. In fact, when you were in Peru, while you an  
20 attorney, a lot of the people who dealt with you there  
21 called you Dr. Careaga, didn't they?

22 A. Same continuing response.

23 Q. And, in fact, after you stopped being an  
24 attorney, people in Peru continued to refer to you as  
25 Dr. Careaga?

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1 A. Same continuing response.

2 Q. You didn't tell the folks on the ground team  
3 that you were working with that you had been disbarred,  
4 had you?

5 A. Same continuing response, sir.

6 Q. You didn't tell the potential clients with  
7 whom you met that you had been disbarred and were  
8 working for American lawyers, did you?

9 A. Same continuing response, sir.

10 Q. How did you locate -- how did you identify --  
11 let's start with that. How did you identify these  
12 potential clients with whom the ground team met?

13 A. Same continuing response, Madam Court  
14 Reporter.

15 Q. Having identified potential clients for the  
16 ground team to meet with, how did you locate them?

17 A. Same response.

18 Q. How about those potential clients with whom  
19 the attorneys were going to meet in person, how did you  
20 identify potential clients for the attorneys to meet  
21 with?

22 A. Same continuing response.

23 Q. And how did you locate those clients?

24 A. Same continuing response.

25 Q. All right. You speak, read, and write the

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1 Spanish language, don't you?

2 A. Same continuing response, sir.

3 Q. In fact, you're, fair to say, bilingual?

4 A. Same continuing response.

5 Q. Unfortunately, my Spanish is that of a not  
6 particular bright four-year-old, so you'll have to  
7 forgive me in any mispronunciation I do.

8 But let's take a look at our first document  
9 that is going to be in translation, this is Exhibit 5?

10 (Thereupon, Formalization and Continuation of  
11 the Preparatory Investigation was marked as  
12 Exhibit Number 5 for identification.)

13 BY MR. KUNTZ:

14 Q. So for the record, in the sake of good order,  
15 we'll be looking throughout this deposition at various  
16 documents that were originally written in Spanish, and  
17 now we're going to have with them certified English  
18 translations. I think all these translation we have  
19 here are the certified ones. For convenience,  
20 Mr. Rodriguez and Mr. Careaga, you will see that the  
21 English translation is going to be on top, because  
22 that's the one that I'm going to deal with most of time  
23 given, as I said, my less than elementary Spanish  
24 language skills.

25 Sir, take a look at Exhibit 5, please. Have



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1 you seen that document before?

2 You can -- and if you want to, you can page  
3 through to the Spanish original, which is exactly  
4 halfway through.

5 Have you seen that document before?

6 A. I'll refrain -- I'll refrain and will continue  
7 to refer to my statement at the outset of this  
8 deposition.

9 Q. With regard to that statement, sir, you told  
10 us, I believe, and you'll correct me if I'm wrong, that  
11 you were unaware of the formalization -- of the  
12 formalized charges against you until ten days ago,  
13 correct?

14 A. I continue to refer to my statement.

15 Q. Okay. Ten days ago -- today is August 10th.  
16 So did you first become aware of the formalization on  
17 the 1st of August?

18 A. Same continuing response, Madam Court  
19 Reporter.

20 Q. The 31st of July?

21 A. Same continuing response.

22 Q. Okay. And it's based upon your inclusion in  
23 Exhibit 5 that you are declining to answer questions  
24 here today, correct?

25 A. Same continuing response.

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1 Q. Okay. Go to page 3 of the English  
2 translation, or you can look at the Spanish original if  
3 you would like.

4 A. I'd prefer not to, sir. Thank you.

5 Q. Sir, I'm going to ask you a question about the  
6 document. You're going to answer or you're not going to  
7 answer, that's entirely your decision, but I can't ask  
8 you about -- a question about the document if you won't  
9 look at the document and look where I direct you at the  
10 document.

11 Now, if you choose not to do that, that's a  
12 whole other kettle of fish here. So I'm going to ask  
13 you, please, to look at page 3 of English translation or  
14 the Spanish original, as you prefer, so that I could ask  
15 you a question about it, and then you can do whatever  
16 you want to with that question.

17 A. Out of respect to the federal bench here in  
18 south Florida, I will go ahead and look at the page.

19 Q. Page 3. There you go.

20 If you will notice on page 3, there's  
21 four boxes with names and addresses, and the third box  
22 down, that's your name, isn't it, Victor Armando  
23 Careaga?

24 A. Same continuing response, referring to my  
25 initial statement.

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1 Q. And it's got your address there, doesn't it?

2 A. Same continuing response.

3 Q. Now, it's redacted in this copy that we have  
4 here because we take out personally identifying  
5 information, but in the Spanish language original it had  
6 your correct address, didn't it?

7 A. Same continuing object- -- response.

8 Q. And your contention remains that until ten  
9 days ago, whether that means the 1st of August or the  
10 31st of July, you were unaware of the existence of the  
11 formalization?

12 A. Same continuing objection -- not objection,  
13 response. Excuse me.

14 Q. Right.

15 The formalization which is dated April 27th,  
16 you were unaware of the April 27th formalization until  
17 ten days ago?

18 A. Same continuing response.

19 Q. Okay. You were unaware of it after I spoke of  
20 it in court. That's your contention?

21 A. Same response.

22 Q. And you were unaware of it after the Peruvian  
23 authorities sent it to you?

24 A. Same response.

25 Q. Because they did send it to you, didn't they?

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1 A. Same response.

2 And to be clear, I'm not providing any  
3 answers, whether they are affirmative or negative, to  
4 any of the questions that you've asked for the last  
5 hour. I'm referring to my initial statement. So I want  
6 that clear on the record.

7 Q. Okay. Well, thanks for that.

8 All right. So let's ask some questions about  
9 the formalization. So you weren't notified about the  
10 formalization?

11 A. Same continuing response.

12 Q. Do you know what formalization -- I'm going to  
13 try to Spanish -- "formalización" means in the context  
14 of a Peruvian criminal investigation?

15 A. I refer to my statement at the outset of this  
16 deposition.

17 Q. Is it fair to say that by way of this  
18 formalization, you have become an "imputado,"  
19 I-M-P-U-T-A-D-O, an "imputado" or target of this  
20 investigation, correct?

21 A. Same response.

22 Q. Okay. In fact, you've now been provisionally  
23 charged with being a member of a criminal organization,  
24 correct?

25 A. Same continuing response.

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1 Q. You've been provisionally charged with forgery  
2 of documents, correct?

3 A. Same continuing response.

4 Q. And you've been charged with forgery of public  
5 instruments, correct?

6 A. Same continuing response.

7 Q. Okay. Are you familiar with the -- you are --  
8 you must be -- you are familiar, aren't you, with the  
9 term "sospecha relevadora," S-O-S-P-E-C-H-A- -- all the  
10 Spanish speakers are laughing at my accent, I know it.

11 MR. RODRIGUEZ: I'm not laughing. I'm  
12 coughing.

13 MR. KUNTZ: No, no, no, Frank, you'd be  
14 entitled to it.

15 BY MR. KUNTZ:

16 Q. S-O-S-P-E-C-H-A, R-E-L-E-V-A-D-O-R-A.

17 You're familiar with that term, aren't you?

18 A. Same continuing response, sir.

19 Q. The best English translation for that would be  
20 a revelatory suspicion; isn't that correct?

21 A. Same continuing response.

22 Q. And that is the degree of suspicion that the  
23 formalization expresses with regard to your  
24 participation in these three crimes, correct?

25 A. Same continuing response.

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1 Q. Okay. Did you ever hear of -- hold on a  
2 second. I want to get this right.

3 Did you ever hear of an organization called  
4 "los tramitadores de plomo"?

5 MR. KUNTZ: The Spanish is L-O-S,  
6 T-R-A-M-I-T-A-D-O-R-E-S, D-E, P-L-O-M-O.

7 THE WITNESS: Same continuing response.

8 BY MR. KUNTZ:

9 Q. "Los tramitadores de plomo." The best  
10 translation of that would be the lead fixer, isn't it?

11 A. Same continuing response.

12 Q. And you and -- according to this  
13 formalization, and this is true, right, you and  
14 Mr. Eduardo Gianni Ayala Maura and Mr. Jose Luis Calmell  
15 del Solar Diaz, you formed the lead fixers organization,  
16 didn't you?

17 A. Same continuing response.

18 Q. You also formed something called the Huancayo  
19 group, didn't you?

20 A. Same continuing response.

21 Q. What's your relationship with Eduardo Ayala?

22 A. Same continuing response.

23 Q. Where did you first meet Eduardo Ayala?

24 A. Same continuing response.

25 Q. When did you first meet Jose Luis Calmell?

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1 A. Same continuing response.

2 Q. What's your relationship with Mr. Calmell?

3 A. Same continuing response.

4 Q. Go ahead and take a look at page -- starting  
5 at page 3 of Exhibit 5.

6 Do you know a man named Jorge -- you know a  
7 man named Jorge Luis Mesias Salazar, don't you?

8 A. Same continuing response.

9 Q. You can turn the page.

10 You know a man named Richard Lucio -- Richard  
11 Lucio Romero Chavez, don't you?

12 A. Same continuing response.

13 Q. You know a man named Miguel Angel Curi Osorio,  
14 don't you?

15 A. Same continuing response.

16 Q. You know someone named Gean Carlo Cartulin  
17 Landeo, don't you?

18 A. Same continuing response.

19 Q. You also know Samantha Gabriela Roman Flores  
20 Varillas?

21 A. Same continuing response.

22 Q. You know Angel Camarena Montes, don't you?

23 A. Same continuing response.

24 Q. You know Gisela Berenis Paitan Lozano, don't  
25 you?

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1 A. Same continuing response.

2 Q. You know Rosario Renee Galarza Roque, don't  
3 you?

4 A. Same continuing response.

5 Q. And you know Arenio Hugo Sanchez Baltazar,  
6 don't you?

7 A. Continue to refer to my statement at the  
8 beginning of this deposition.

9 Q. Those and yourself are the 12 "imputados" or  
10 targets of the formalization, aren't they?

11 A. Same continuing response.

12 Q. Okay. As one of the founders of los  
13 tramitadores de plomo, the lead fixers, you were really  
14 kind of the mastermind of the ground operation in Peru,  
15 weren't you?

16 A. Same continuing response.

17 Q. And more than just conceiving of it, you  
18 helped to run it on a day-to-day basis from the  
19 beginning of its inception, didn't you?

20 A. Same continuing response.

21 Q. Take a look at page 18 of the formalization.  
22 Again, this is a translation. You shared, and I just  
23 want to make sure that the pages coordinate.

24 Sure do.

25 So you can look at page 18 of the Spanish



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1 language translation, if you prefer that.

2 You shared first-level status in this criminal  
3 organization with Mr. Ayala Maura and Mr. Calmell,  
4 correct?

5 A. Same continuing response.

6 Q. And below you on the next tier was Jorge  
7 Mesias, correct?

8 A. Same continuing response.

9 Q. And then everybody else, they were down on  
10 that fourth level out on the street doing what you  
11 directed them to do, correct?

12 A. Same continuing response.

13 Q. Okay. While you were working at Rodriguez  
14 Tramont, Mr. Rodriguez knew that you were involved in  
15 the activities described in the formalization in Peru,  
16 didn't he?

17 A. Same continuing response.

18 Q. So did Mr. Tramont?

19 A. Same continuing response.

20 Q. And so did Mr. Nunez?

21 A. Same continuing response.

22 Q. And while you were employed with Louis Thaler,  
23 Mr. Thaler knew that you were involved in the activities  
24 described in the formalization, didn't he?

25 A. Same continuing response, sir.

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1 Q. Because in your declaration recently filed  
2 under oath in this matter, you stated that you were  
3 working at their delegation according to protocols that  
4 they laid down. So they knew what you were up to,  
5 didn't they?

6 A. Same continuing response.

7 Q. Likewise, Mr. Halpren, he knew what you were  
8 up to, didn't he?

9 A. Same continuing response, sir.

10 Q. And the attorneys at Schlichter Bogard?

11 A. Same continuing response.

12 Q. Okay. You're aware, aren't you, that we refer  
13 to the two large groups of cases in the Eastern District  
14 Missouri as the Collins cases and the Reed cases,  
15 correct?

16 A. Same continuing response, Madam Court  
17 Reporter.

18 Q. The Reed cases predate -- have an earlier case  
19 number beginning than in the Collins cases, correct?

20 A. Same response, sir.

21 Q. And your work began in the very earliest  
22 stages of the Reed cases, didn't it?

23 A. Same response, sir.

24 Q. And part of that work was the activities  
25 described in the formalization, correct?

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1 A. Same continuing response.

2 Q. When you started to work on the Reed -- on the  
3 Collins cases, the same efforts that you'd established  
4 in support of the Reed cases you continued in support of  
5 the Collins cases, didn't you?

6 A. Same response, sir.

7 Q. I can't recall if I asked you this, and if I  
8 did, I apologize, do you have counsel -- legal counsel  
9 in Peru?

10 A. Same continuing response.

11 Q. Do you have any legal counsel here in the  
12 United States?

13 A. Same continuing response.

14 Q. But you're here pro se today?

15 A. Yes, I am.

16 Q. Mr. Rodriguez isn't you're lawyer today?

17 A. I am unrepresented.

18 Q. Got it.

19 Has Mr. Rodriguez ever been your lawyer?

20 A. I am unrepresented, sir.

21 Q. Yes, I understand that, sir, as an answer to  
22 the present state of affairs. I'm asking you  
23 historically, has Mr. Rodriguez ever been your attorney?

24 A. I'll continue to refer to my statement.

25 Q. Had Mr. Halpren ever been your attorney?

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1 A. Same response, sir.

2 Q. Was Mr. Thaler ever your attorney?

3 A. Same response.

4 Q. Was anyone at the Schlichter Bogard firm ever  
5 your attorney?

6 A. Same response.

7 Q. Let's talk about a Peruvian national by the  
8 name of Richard Romero. His full name is Richard Lucio  
9 Romero Chavez, but as I think I have this correct,  
10 Chavez is the matronymic, Romero is the patronymic, so  
11 we call him Richard Romero.

12 You know Richard Romero, don't you?

13 A. Same continuing response.

14 Q. You first spoke to Richard Romero in 2006,  
15 didn't you?

16 A. Same continuing response, Madam Court  
17 Reporter.

18 Q. Your first contact with Mr. Romero in 2006 was  
19 by telephone, wasn't it?

20 A. Same continuing response.

21 Q. Okay. Thereafter you met him in person,  
22 didn't you?

23 A. I continue to refer to my statement.

24 Q. Do you know a lawyer at the Napoli firm by the  
25 name of Patrick Lanciotti?

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1 A. I continue to refer to my statement.

2 Q. Let me show you Exhibit Number 6.

3 (Thereupon, Napoli Shkolnik letter dated  
4 December 8, 2021 was marked as Exhibit Number 6  
5 for identification.)

6 MR. KUNTZ: We'll go another -- to give  
7 everybody a sense of the schedule, we'll go another  
8 20 minutes or so. That will have been an hour  
9 since our last break. We'll take a short break at  
10 that point, in case anybody is looking at the door.

11 BY MR. KUNTZ:

12 Q. All right. So here -- what did I just do with  
13 the Lanciotti?

14 There we go.

15 Sir, have you ever seen Exhibit 6 before?

16 A. I continue to refer to my statement.

17 Q. Okay. Mr. Lanciotti has a strong opinion  
18 about Mr. Romero that he expresses in this letter. Have  
19 you ever heard Mr. Lanciotti -- you've heard  
20 Mr. Lanciotti's opinion about Mr. Romero before, haven't  
21 you?

22 A. I continue to refer to my statement.

23 Q. Mr. Lanciotti writes in the second paragraph  
24 on the first page that "Mr. Romero is a disgruntled  
25 former employee who had a drinking problem, is an

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1 admitted forgerer" -- no, "is an admitted forger, felon,  
2 and liar, and was fired due to his lack of integrity and  
3 dishonesty."

4 Did I read that correctly, sir?

5 A. I continue to refer to my statement.

6 Q. Would you look at the document, though?

7 A. I'll read it.

8 Q. Okay. Great.

9 Mr. Lanciotti wrote this letter in December of  
10 2021. When Mr. Romero was an employee, as referred to  
11 by Mr. Lanciotti, and you were supervising his  
12 activities, did you consider him to be a forger, felon,  
13 and liar?

14 A. I'll continue to refer to my statement.

15 Q. Did you consider him to lack integrity and  
16 honesty?

17 A. I'll continue to refer to my statement.

18 Q. Did you think he was a drunk?

19 A. Same continuing response.

20 Q. If you had thought that Mr. Romero was all the  
21 things that Mr. Lanciotti said he was, you'd fired him  
22 long before he got fired, wouldn't you have?

23 A. Same continuing response, sir.

24 For the record, I continue to assert my  
25 constitutional rights and privileges under Peruvian law,

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1 and the reason for the continued responses that I'm  
2 giving to this deposition.

3 Q. I think the record is very clear on that.

4 Thank you.

5 As his supervisor, it was your obligation to  
6 know whether Mr. Romero was a forger, wasn't it?

7 A. Same continuing response.

8 Q. It's your obligation to know if he was a  
9 felon, wasn't it?

10 A. Same continuing response.

11 Q. Your obligation to know if he was a liar,  
12 wasn't it?

13 A. Same continuing response.

14 Q. Your obligation to know -- it was your  
15 obligation to know if he could be trusted, wasn't it?

16 A. Same response, sir.

17 Q. But you employed him anyway, didn't you?

18 A. Same response.

19 Q. What were Mr. Romero's duties?

20 A. Same response, sir.

21 Q. One of Mr. Romero's duties included obtaining  
22 documents from government offices, didn't it?

23 A. Same continuing response.

24 Q. Mr. Romero's duties included obtaining  
25 signatures from clients of the law firms by which you

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1 were employed, wasn't it?

2 A. Same continuing response, sir.

3 Q. Mr. Romero's duties included meeting with  
4 potential clients, didn't it?

5 A. Same continuing response.

6 Q. Mr. Romero's duties included supervising  
7 notarization or notarization and formalization of  
8 documents that were submitted -- that were produced in  
9 the Eastern District of Missouri Court actions, wasn't  
10 it?

11 A. Same response.

12 Q. For all of those duties that Mr. Romero had,  
13 having a character of honesty and integrity was an  
14 important factor, wasn't it?

15 A. Same response, sir.

16 Q. And yet Mr. Romero, who Mr. Lanciotti  
17 described in such glowing terms, continued in your  
18 employ for many years in those activities and others,  
19 didn't he?

20 A. Same response, sir.

21 Q. Despite this later assessment of his  
22 character?

23 A. Same response.

24 Q. You couldn't really trust any document that  
25 Mr. Romero brought to you, could you?



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1 A. Same response, sir.

2 Q. Couldn't believe anything that he told you,  
3 could you?

4 A. Same response.

5 Q. Mr. Romero was compensated for his duties,  
6 wasn't he?

7 A. Same response, sir.

8 Q. In fact, Mr. Romero received frequent payments  
9 from you, didn't he?

10 A. I'm referring to my statement. Same  
11 continuing response.

12 Q. Those frequent payments that Mr. Romero  
13 received were primarily sent to him via Western Union  
14 transfers, weren't they?

15 A. Same continuing response.

16 Q. And source of the funds that you paid  
17 Mr. Romero, the liar, forger, felon, the source of those  
18 funds were the United States law firms, weren't they?

19 A. Same continuing response.

20 Q. Let's take a look at Exhibit 7.

21 (Thereupon, Western Union transfers were marked  
22 as Exhibit Number 7 for identification.)

23 MR. KUNTZ: This will take a minute, guys,  
24 because she's got to get many copies and it's huge.

25 That's me.

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1 Thank you.

2 If you throw that too hard, the binder clip  
3 will come open, so try not to.

4 MR. RODRIGUEZ: Thank you.

5 This Exhibit 7?

6 MR. KUNTZ: 7.

7 BY MR. KUNTZ:

8 Q. Sir, have you ever seen a Western Union  
9 transmission confirmation document like this before?

10 A. Same continuing response, Madam Court  
11 Reporter.

12 Q. Okay. I'm going to walk you through the form  
13 a little bit so that we can follow up.

14 MR. KUNTZ: But noting for the record, and for  
15 counsel again, you're going to find about halfway  
16 through is where the Spanish language originals  
17 are, and these on top are the English translations.  
18 The English language translator has also  
19 translated -- Frank, I'm pointing so you can see,  
20 his translated handwritten notes from the originals  
21 are translated here in script on the top of the  
22 exhibit.

23 MR. RODRIGUEZ: Got it.

24 Thank you.

25 MR. KUNTZ: You're welcome.

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1 BY MR. KUNTZ:

2 Q. Okay. So you know what -- with regard to a  
3 Western Union transfer, you know what a  
4 "beneficiario" -- it's B-E-N-E-F-I-C-I-A-R-I-O,  
5 "beneficiario."

6 You know what a "beneficiario" is, don't you?

7 A. Same response, sir.

8 Q. That's the person who is receiving the money  
9 being sent, correct?

10 A. Same continuing response.

11 Q. And you know what a "remitente" is?

12 R-E-M-I-T-E-N-T-E.

13 You know what a "remitente" is, don't you?

14 A. Same continuing response.

15 Q. That is the person who is sending the money,  
16 correct?

17 A. Same continuing response.

18 Q. Why don't you take a look at that top Western  
19 Union form in translation, and you'll notice with me,  
20 sir, that it designates the date and time that the  
21 transmission of money was made?

22 A. Same continuing response.

23 Q. And it -- it denotes who got it?

24 A. Same response.

25 Q. Where the funds came from?

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1 A. Same response, sir.

2 Q. Okay. Now, some of these, and I'm going to  
3 show you -- well, yeah. Let me show you one from the  
4 middle here.

5 The Western Union receipt for -- and these are  
6 Latin style dates. So this is the 3rd of December 2014.  
7 That one has, and many of them do, has a handwritten  
8 note on it. Do you see that handwritten note?

9 A. Same continuing response.

10 Q. Well, my question is: Do you see the note,  
11 the handwritten note?

12 A. I see -- I see letters.

13 Q. You see letters.

14 Okay. You wrote those letters, didn't you?

15 A. Same continuing response.

16 Q. Okay. Now, why were you sending Richard  
17 Romero so much money?

18 A. Same continuing response, sir.

19 Q. When I tell you that Exhibit 7 comprises  
20 evidence of 68 payments to Richard Romero totaling  
21 \$56,475, that's not a surprise to you, is it?

22 A. Same continuing response, Madam Court  
23 Reporter.

24 Q. In fact, that sounds like how much money you  
25 sent to Richard Romero in the period reflected in these

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1 reports, right?

2 A. Same response, Madam Court Reporter.

3 Q. Now, because Exhibit 7 is so bulky, what we've  
4 done is we've taken three examples out of Exhibit 7,  
5 made them their own exhibits so we can talk about them  
6 in particular, which will make our life easier.

7 Sir, just so we're clear, you're not denying  
8 that Exhibit 7 reflects Western Union payments made by  
9 you, as it states, "remitente" -- "remitente" to Richard  
10 Lucio Romero Chavez, the beneficiary. You're not  
11 denying that, are you?

12 A. Same response, Madam Court Reporter.

13 Q. Because you sent him all of this money, didn't  
14 you?

15 A. Same response, sir.

16 Q. And that money came from the lawyers here in  
17 Florida, didn't it?

18 A. Same response, sir.

19 Q. Or did it come from -- could some of it have  
20 come from the lawyers in Missouri?

21 A. Same response, sir.

22 Q. Okay. All right.

23 So let's take a look at Exhibit 8?

24 (Thereupon, Western Union, 4th of June 2015, was  
25 marked as Exhibit Number 8 for identification.)

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1 MR. KUNTZ: So again, so everybody is -- do we  
2 have the translated -- yeah.

3 Okay. Good.

4 So just so the record is crystal clear -- I'll  
5 wait for the -- sorry. You can't do two things at  
6 once.

7 MR. RODRIGUEZ: This is a one-page exhibit?

8 MR. KUNTZ: Yeah. Exhibit 8, just so the  
9 record is clear, Exhibit 8 is simply a page from  
10 Exhibit 7, to make it less unwieldy, which I guess  
11 makes it more wieldy and easier to look at.

12 BY MR. KUNTZ:

13 Q. So let's take a look at Exhibit 8 before you,  
14 sir.

15 Do you see on the top there that the  
16 "beneficiario" is Mr. Romero, isn't it?

17 A. I continue to refer to my statement.

18 Q. And the "remitente," the person making the  
19 payment, is Victor Careaga?

20 A. I refer to my statement.

21 Q. There are no other Victor Armando Careaga in  
22 Miami, are there?

23 A. Same continuing response, sir.

24 Q. Okay. And it says that the origin, the place  
25 of origin is "estados unidos," Miami, which is the

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1 United States, Miami, correct?

2 A. Same continuing response.

3 Q. And this payment which is made on the 4th of  
4 June 2015, you'll see it up on the top there. Do you  
5 see the date on the top?

6 A. Same continuing response.

7 Q. This payment on the 4th of June 2015 was in  
8 the amount of \$2,450, correct?

9 A. Same continuing response.

10 Q. Do you know how many -- do the -- the national  
11 currency of Peru are the soles, correct?

12 A. Same continuing response.

13 MR. KUNTZ: S-O-L-E-S.

14 BY MR. KUNTZ:

15 Q. And in 2015, in June of 2015, do you know how  
16 may soles you could get for a dollar?

17 A. Same continuing response, sir.

18 Q. Kind of a lot, though, right?

19 A. Same continuing response.

20 Q. Okay. So this document, Exhibit 8, it  
21 reflects a payment of -- from you to Romero for \$2,450,  
22 correct?

23 A. Same response, sir.

24 Q. Except they take out \$0.12 tax. So Mr. Romero  
25 actually only gets 2,449.88, correct?

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1 A. Same response, sir.

2 Q. I say "tax," it's "impuesto." That may be a  
3 charge. Do you know if that is a charge or a tax?

4 A. Same response, sir.

5 Q. Okay. But he received this money from you on  
6 that date, didn't he?

7 A. Same response.

8 Q. He got it for his work as a member of the  
9 ground team, correct?

10 A. Same response, sir.

11 Q. All the work that is described in your  
12 declaration Exhibit 4, correct?

13 A. Same response.

14 Q. All the work that is described in the  
15 formalization, Exhibit 5, correct?

16 A. Same response, sir.

17 Q. Okay. Let's take a look at Exhibit 9.

18 (Thereupon, Western Union was marked as Exhibit  
19 Number 9 for identification.)

20 MR. KUNTZ: Thank you.

21 So now, Exhibit 9, which is, again, just a  
22 subset of Exhibit 7, it's in two pages, Frank,  
23 because when you copy the first page, you get this  
24 little yellow receipt, and so you have to flip the  
25 little yellow receipt up to be able to see the



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1 information underneath it. So that explains the  
2 exhibit.

3 BY MR. KUNTZ:

4 Q. Sir, would you take a look at Exhibit 9 for  
5 me.

6 A. It's in front of me.

7 Q. Did you look at it?

8 A. No.

9 Q. Okay. Would you please look at it, sir, so I  
10 can ask you questions about it.

11 A. I have.

12 Q. Thank you.

13 So this exhibit reflects another payment from  
14 you as the "remitente," Victor Careaga, correct?

15 A. Same continuing response, sir.

16 Q. To Mr. Romero, correct?

17 A. Same response, sir.

18 Q. And this payment is in the amount of \$1,950  
19 U.S., correct?

20 A. Same response, sir.

21 Q. And underneath that we can see that in  
22 Peruvian "nuevo soles" that amounted to 6,430.12 soles,  
23 correct?

24 A. I continue to refer to my statement, and I'm  
25 not answering or making any comments about the documents

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1 that have been shown to me.

2 Q. Yes, I see.

3 The source of this payment is slightly  
4 different from exhibit previous, from Exhibit 8.  
5 Exhibit 9 says that the source is "estados  
6 unidos/coral," probably Coral Gables, right, sir?

7 A. Same continuing response.

8 Q. Where is Mr. Rodriguez' office located?

9 A. Same continuing response.

10 Q. His office is in Coral Gables, isn't it?

11 A. Same continuing response.

12 Q. Let's take a look at our third example,  
13 Exhibit 10.

14 (Thereupon, Western Union, 10th of November  
15 2014, was marked as Exhibit Number 10 for  
16 identification.)

17 BY MR. KUNTZ:

18 Q. Once again, Exhibit 10 is merely a sub piece  
19 of Exhibit 7.

20 MR. KUNTZ: And after we -- just so everybody  
21 knows, after we talk about this exhibit, it will be  
22 time for a little break.

23 BY MR. KUNTZ:

24 Q. Exhibit 10 is just a subpart. It's in two  
25 pages so that both the yellow receipt and the

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1 information that the yellow receipt would obscure is  
2 evident to us.

3 Have you looked at Exhibit 10, sir?

4 A. Yes.

5 Q. Thank you.

6 I'm going to ask you some questions about it.

7 Once again -- and this is on 10th of  
8 November 2014. Once again, you are the person making  
9 the payment, correct?

10 A. Same continuing response.

11 Q. And the person receiving the payment is  
12 Mr. Romero?

13 A. Same continuing response.

14 Q. And the place origin is the United States,  
15 Miami?

16 A. Same continuing response.

17 Q. And in this case you sent \$900 to Mr. Romero,  
18 correct?

19 A. Same continuing response.

20 Q. Now, someone has written a handwritten note on  
21 this receipt, it's written in Spanish. Are you able to  
22 see that handwritten note?

23 A. I see letters written.

24 Q. You see letters written, sir, or do you see  
25 words?

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1 A. Words.

2 Q. Okay. So we agree that those are words.

3 Okay. Do you agree, sir, that it says "envio para  
4 record," and then I can't tell -- let's talk about the  
5 first three words. "Envio para record," that's what it  
6 says, isn't it?

7 A. I continue to refer to my statement.

8 Q. Okay. And then the next word is either  
9 "medica" or "medico," isn't it?

10 A. I continue to refer to my statement.

11 Q. Why were you sending Richard Romero \$900 in  
12 November of 2014 to "envio para record medico"?

13 A. Same continuing response.

14 Q. Okay. Is that -- that's the correct -- that  
15 note is correct that that's what these funds are for,  
16 right?

17 A. Same continuing response.

18 Q. Okay. With regard to the Exhibit 7, which, of  
19 course, means with regard to 7, 8, 9, and 10 since 8, 9,  
20 10 are part of 7. With regard to that exhibit, were  
21 those payments part of any business or person's tax  
22 reporting, as far as you know?

23 A. Same continuing response.

24 Q. Where do the other -- there are other records  
25 of these payments, aren't there?

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1 A. Same continuing response.

2 Q. You have records from when you received the  
3 funds that you transmitted to Mr. Romero, didn't you?

4 A. Same continuing response, sir.

5 Q. And you've retained those records of where you  
6 received the funds from Mr. -- that you sent to  
7 Mr. Romero because that would be good business practice,  
8 wouldn't it?

9 A. Same continuing response.

10 Q. You haven't produced any of those records of  
11 transmissions of funds pursuant to the subpoena under  
12 which you appear today, have you?

13 A. Same continue response, sir.

14 Q. Okay. You used to be a lawyer, right?

15 A. Same continuing response.

16 Q. Do you know if the transmission of funds -- if  
17 a document reflecting the transmission of funds is  
18 entitled to a work product privilege?

19 A. Same continuing response, sir.

20 Q. It's not, is it?

21 A. Same continuing response.

22 Q. Likewise, a record documenting the  
23 transmission of funds to a third party isn't entitled to  
24 an attorney-client privilege, is it?

25 A. Same continuing response.

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1 Q. So all of the records that you might have  
2 regarding obtaining and transmitting funds to Mr. Romero  
3 for him to continue his operation as one of the key  
4 people in the ground operation in Peru that you were in  
5 charge of, all of those would be subject to production,  
6 wouldn't they?

7 A. Same response, sir.

8 Q. Okay. Mr. Romero has stated that he and  
9 others in the ground team were paid compensation on what  
10 I'm going to call a "piecework basis." That is on the  
11 basis of the number of clients who were signed up.  
12 That's correct, isn't it?

13 A. Same continuing response.

14 Q. They were also paid on the -- on a piecework  
15 basis on the number of documents they obtained. That's  
16 correct, isn't it?

17 A. Same continuing response.

18 Q. They were also paid piecework basis on the  
19 number of notarized signatures they obtained, weren't  
20 they?

21 A. Same response, sir.

22 Q. Okay. In fact, sir, from the time you began  
23 it to this day the recruiting effort to obtain clients  
24 for the Missouri matters has cost upwards of a million  
25 dollars, hasn't it?

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1 A. Same continuing response, sir.

2 Q. Did you ever -- but you've told people that it  
3 cost a million dollars, haven't you?

4 A. Same continuing response.

5 Q. You'll tell them but you won't tell me, huh?

6 A. Same continuing response, sir.

7 MR. KUNTZ: All right. I think this is a  
8 convenient time for a break. Let's break a -- I  
9 don't know, ten minutes or so, everybody here and  
10 on the phone can get the bio break.

11 THE VIDEOGRAPHER: Off record 11:18 a.m.

12 (There was a discussion off of the record.)

13 THE VIDEOGRAPHER: On record 11:37 a.m.

14 BY MR. KUNTZ:

15 Q. You are a frequent visitor to the country of  
16 Peru, aren't you?

17 A. I refer to my statement at outset of this  
18 deposition.

19 Q. In fact, since your disbarment --

20 MR. KUNTZ: Give me 11 -- 11.

21 BY MR. KUNTZ:

22 Q. Since your disbarment, you've traveled to  
23 Peru --

24 MR. KUNTZ: Just hold on to it. Not yet.

25 BY MR. KUNTZ:

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1 Q. Since your disbarment you've traveled to Peru  
2 11 times, correct?

3 A. Same continuing response.

4 Q. Okay. Let's take a look now at Exhibit 11.  
5 (Thereupon, Peruvian border control authorities  
6 was marked as Exhibit Number 11 for  
7 identification.)

8 MR. RODRIGUEZ: Thank you.

9 BY MR. KUNTZ:

10 Q. Okay. Do you have a -- good. You've got  
11 Exhibit 11.

12 Your birth date is in 1961, correct?

13 A. Same continuing response.

14 Q. Okay. So what's before you, sir, in  
15 Exhibit 11 are the records of the Peruvian border  
16 control authorities which are, in fact, public record  
17 and record everyone's entry and exit into and out of the  
18 country.

19 You traveled to Peru sometimes on your own,  
20 didn't you?

21 A. Same continuing response.

22 Q. But you also traveled to Peru on several  
23 occasions with Mr. Rodriguez?

24 A. Same continuing response.

25 Q. On several occasions you arrived, in fact --



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1 strike that.

2 On all the occasions where you traveled to  
3 Peru with Mr. Rodriguez, you all went on the same day,  
4 correct?

5 A. Same continuing response.

6 Q. Sometimes five instances, you departed on the  
7 same day, correct?

8 A. Same continuing response.

9 Q. Other times, four instances, you would remain  
10 in Peru for a day or two after Mr. Rodriguez had  
11 departed, correct?

12 A. Same continuing response.

13 Q. Okay. Besides traveling to Peru with  
14 Mr. Rodriguez, usually you stayed in the same hotel,  
15 didn't you?

16 A. Same continuing response.

17 Q. The hotel "Los Portales" in Tarma, Peru was  
18 one of the hotels that you and Mr. Rodriguez stayed at  
19 together, right?

20 A. Same continuing response.

21 Q. All right. So let's talk about a particular  
22 visit to Peru you and Mr. Rodriguez shared, and I'm  
23 going to direct you to first page of Exhibit 11, about  
24 the middle of the page.

25 By the way, a core of these records is that

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1 they are read from the back to the front and from the  
2 bottom to the top, the most recent trip being at the  
3 top, the most -- the trip longest to go being at the  
4 bottom.

5 So on the first page, about the middle of the  
6 page we see that you entered Peru from the United States  
7 on the 9th of June 2016, correct?

8 A. Same continuing response, sir.

9 Q. And you stayed until your departure on the  
10 12th of June 2016, correct?

11 A. Same continuing response.

12 Q. Do you recall the events of that trip?

13 A. Same continuing response.

14 Q. Do you recall with whom you met?

15 A. Same continuing response.

16 Q. Do you recall what purpose you went there for?

17 A. Same response, sir.

18 Q. Well, I mean, the purpose that you went there  
19 for was as part of your duties in operating the ground  
20 team in Peru, correct?

21 A. Same continuing response.

22 Q. In 2016 you were no longer a lawyer, correct?

23 A. Same continuing response.

24 Q. You were a disbarred lawyer, weren't you?

25 A. Same continuing response.

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1 Q. And you were a disbarred lawyer in the employ  
2 of a law firm Rodriguez Tramont, correct?

3 A. Same continuing response.

4 Q. And, sir, you're aware, aren't you --

5 MR. RODRIGUEZ: Let me object to the  
6 reference -- just to clarify the record, he was  
7 a -- Careaga was a 1099 and --

8 MR. KUNTZ: Mr. Rodriguez, you're not  
9 permitted --

10 MR. RODRIGUEZ: -- independent contractor --

11 MR. KUNTZ: -- to testify here. I'm going to  
12 move to strike your testimony.

13 MR. RODRIGUEZ: You can strike whatever you  
14 want. Let me just finish my statement.

15 Careaga was a 1099 employee of the Rodriguez  
16 Tramont firm. He was an independent contractor.  
17 To characterize it as an employee -- I'm not sure  
18 that is accurate, but he worked for Rodriguez  
19 Tramont as a 1099 independent contractor.

20 MR. KUNTZ: Okay. So note my motion -- note  
21 my -- mark that statement.

22 Note that I'm going move to have it stricken.  
23 Note my request respectfully to Mr. Rodriguez, who  
24 has been an attorney I think longer than I have,  
25 and perfectly well knows that not -- not only are

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1 speaking objections impermissible, but so certainly  
2 is testimony by an attorney.

3 And so especially certainly is testimony under  
4 the circumstances in which Mr. Rodriguez appears  
5 here today as an intervening party for a limited  
6 purpose, and I ask him not to do that anymore.

7 BY MR. KUNTZ:

8 Q. So in 2016 -- in June of 2016 you traveled to  
9 Peru with Mr. Rodriguez?

10 A. Same response, sir.

11 Q. And you were there for the purposes we've  
12 described, operating the ground team?

13 A. Same response.

14 Q. And you were a disbarred lawyer?

15 A. Same response.

16 Q. And you were in the pay of Mr. Rodriguez'  
17 firm, correct?

18 A. Same response, sir.

19 Q. And you are aware that the Florida Bar has  
20 exceedingly precise and strict rules regarding the  
21 employment of disbarred lawyers in law firms, correct?

22 A. Same response, sir.

23 Q. And Mr. Rodriguez was aware of those  
24 requirements too, wasn't he?

25 A. Same response, sir.

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1 Q. I mean, you all filled out papers every  
2 quarter under oath to the Florida Bar stating your  
3 compliance, both yours and Mr. Rodriguez' law firm,  
4 stating your compliance with the strictures that limited  
5 your role as a disbarred lawyer in the service of a law  
6 firm, didn't you?

7 A. Same response, sir.

8 Q. Okay. So during this June --

9 MR. KUNTZ: You about ready for the video?

10 MS. NICHOLSON: Do you want me to --

11 MR. KUNTZ: Get ready.

12 BY MR. KUNTZ:

13 Q. So in this trip in June of 2016 with  
14 Mr. Rodriguez, you met with a number of prospective  
15 clients, didn't you?

16 A. Same continuing response, sir.

17 Q. A lawyer by the name of Hunter Shkolnik was  
18 also present during this time, wasn't he?

19 A. Same continuing response.

20 Q. And he also met with prospective clients,  
21 didn't he?

22 A. Same continuing response.

23 Q. You acted as his interpreter at some points,  
24 didn't you?

25 A. Same continuing response.

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1 Q. Mr. Shkolnik evidently has less Spanish than I  
2 do, and he needed you to interpret English to Spanish,  
3 didn't he?

4 A. Same continuing response.

5 Q. You met with these prospective clients in  
6 person, didn't you?

7 A. Same continuing response.

8 Q. Mr. Rodriguez met with them in person while  
9 you were there, didn't he?

10 A. Same continuing response, sir.

11 Q. Mr. Shkolnik met with them in person, didn't  
12 he?

13 A. Same continuing response.

14 Q. All right. Let's take a look at a video, this  
15 is Exhibit 12.

16 MR. KUNTZ: What we're going to do is, we've  
17 got it on a thumb drive, so I guess by way of  
18 introducing it we can copy the thumb drive and send  
19 it to all concerned.

20 MS. NICHOLSON: They're there, Robert.

21 MR. KUNTZ: Oh, we have them?

22 Oh, great. Look at this. We're so much more  
23 efficient than I thought we were.

24 Sorry. I didn't mean to throw it.

25 (Thereupon, Thumb drive with video was marked as

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1 Exhibit Number 12 for identification.)

2 BY MR. KUNTZ:

3 Q. Mr. Careaga, I guess you can look at one too,  
4 we're going to play the video there.

5 Okay. Go ahead.

6 MS. NICHOLOS: Give me one second.

7 MR. KUNTZ: It's okay. These things are  
8 always like this.

9 (Video is played.)

10 MR. KUNTZ: Can we start with 13:30? Can we  
11 start with 13:30?

12 Yeah. I'm sorry.

13 Let's key it up to -- to make the record  
14 clear, we're going to key the video up to 13 minute  
15 and 30 second mark.

16 Of course, you'll have the whole video.

17 (Video is fast forwarded to 13:30.)

18 MS. NICHOLSON: 13:30.

19 MR. KUNTZ: There you go. Right there is  
20 good.

21 (Video is played.)

22 BY MR. KUNTZ:

23 Q. That's you there, isn't it, sir, in that --  
24 you're in that video right there, aren't you, sir?

25 A. Same continuing response, Mr. Kuntz.

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1 Q. And that's Mr. Shkolnik saying that's all the  
2 Spanish that he knows, right?

3 A. Same continuing response.

4 Q. That's you translating for Mr. Shkolnik, isn't  
5 it?

6 A. Same continuing response.

7 Q. That's you, right, speaking Spanish?

8 A. Same continuing response.

9 (Following is transcribed from the video being  
10 played:)

11 UNIDENTIFIED SPEAKER: "Is one of the largest  
12 law firms in the United States that brings cases  
13 against big companies when they poison the  
14 environment."

15 BY MR. KUNTZ:

16 Q. Mr. Shkolnik.

17 And now you in Spanish, correct?

18 A. Same continuing response.

19 (Following is transcribed from the video being  
20 played:)

21 UNIDENTIFIED SPEAKER: (Spanish is spoken.)

22 UNIDENTIFIED SPEAKER: "We have the  
23 experience. We have the people. We have the  
24 resources that leads to take the fight against big  
25 companies."



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1 UNIDENTIFIED SPEAKER: (Spanish is spoken.)

2 MR. KUNTZ: You can stop there, Meagan.

3 Thank you.

4 (Video is stopped.)

5 MR. HALPREN: Mr. Kuntz?

6 MR. KUNTZ: Yes, Mr. Halpren.

7 MR. HALPREN: I couldn't see the video. Is  
8 there a way for you to just give me a brief  
9 synopsis of what was shown?

10 MR. KUNTZ: Let me think. I just want to  
11 follow the rules.

12 I would say that you saw a clip of a video  
13 from a sports arena. There were three men in suits  
14 standing in the sport arena.

15 BY MR. KUNTZ:

16 Q. My question to Mr. Careaga is: The three men  
17 in suits, Mr. Careaga, were you, Mr. Shkolnik, and  
18 Mr. Rodriguez, correct?

19 A. Same continuing response.

20 Q. And, Mr. Care- --

21 MR. KUNTZ: This is how we will do it, Jay.

22 BY MR. KUNTZ:

23 Q. And that was you translating English to  
24 Spanish for Mr. Shkolnik, wasn't it?

25 A. Same continuing response.

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1 Q. Mr. Shkolnik was telling those in  
2 attendance -- all those in attendance about the size of  
3 his law firm, correct?

4 A. Same continuing response.

5 Q. And he was telling them about his commitment  
6 to suing Doe Run and Renco, wasn't he?

7 A. Same continuing response, sir.

8 MR. KUNTZ: Mr. Halpren, that's about what  
9 that section of the video said. We are going to  
10 send you the whole video.

11 MR. HALPREN: Okay. Thank you.

12 I appreciate the synopsis.

13 MR. KUNTZ: I understand. We do what we can  
14 with Zoom attendance. I get it.

15 BY MR. KUNTZ:

16 Q. So when you were disbarred by the Florida Bar,  
17 among the restrictions that the Bar placed on you should  
18 you work for a law firm was that you were not permitted  
19 to meet with clients, were you?

20 A. Same continuing response, sir.

21 Q. You were not permitted to meet with clients on  
22 your own, were you?

23 A. Same continuing response.

24 Q. You were not permitted to meet with clients  
25 with an attorney, were you?

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1 A. Same continuing response.

2 Q. You were not permitted to meet with clients  
3 with Mr. Rodriguez?

4 A. Same continuing response.

5 Q. You're not permitted to meet with clients with  
6 Mr. Shkolnik?

7 A. Same continuing response, sir.

8 Q. The Florida Bar expressly told you that you  
9 were not permitted to act as an interpreter in a client  
10 meeting, didn't they?

11 A. Same continuing response.

12 Q. And you and Mr. Rodriguez during the term that  
13 you were working for Mr. Rodriguez on a quarterly basis  
14 submitted sworn statements to the Florida Bar to the  
15 effect that you and the firm were complying with all of  
16 the Bar's restrictions regarding your activities, didn't  
17 you?

18 A. Same continuing response.

19 Q. And when you were employed by Mr. Thaler's  
20 firm, before you went to work for Mr. Rodriguez' firm,  
21 you had the same restrictions, didn't you?

22 A. Same continuing response.

23 Q. And you submitted the same quarterly reports  
24 under oath attesting to your compliance with those  
25 restrictions, didn't you?

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1 A. Same continuing response.

2 Q. As did Mr. Thaler, correct?

3 A. Same continuing response.

4 Q. There were clients in that sport arena in the  
5 video that we saw in Exhibit 12, weren't there?

6 A. Same continuing response.

7 Q. There were prospective clients in that sports  
8 arena, weren't there?

9 A. Same response, sir.

10 Q. There were employees of the sports arena,  
11 weren't there?

12 A. Same response.

13 Q. There were security personnel, weren't there?

14 A. Same response, sir.

15 Q. Were there any snack vendors present?

16 A. Same response.

17 Q. Okay. So now this video that we looked at  
18 occurred in June of 2016. So the quarter that would end  
19 the reporting period for June 2016 would have been Q3 of  
20 2016. You all submitted an affidavit of compliance with  
21 the Florida Bar for Q3 of 2016, didn't you?

22 A. Same response, sir.

23 Q. And in that you swore that you had not engaged  
24 in any of the prohibited activities that were denied you  
25 as a disbarred lawyer, didn't you?

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1 A. Same response, sir.

2 Q. And Mr. Rodriguez swore that you had not  
3 engaged in any of the prohibited activities that were  
4 barred you as a disbarred lawyer, didn't he?

5 A. I refer to my statement at the outset of this  
6 deposition.

7 Q. And we just saw a video where you're violating  
8 those restrictions while you stand next to  
9 Mr. Rodriguez, didn't we?

10 A. Same response, sir.

11 Q. So when you filed that Q3 report in 2016 under  
12 oath, that was a false statement, wasn't it?

13 A. Same response, sir.

14 Q. And when Mr. Rodriguez filed, because the  
15 lawyers have to sign too -- wait a minute. It wasn't  
16 Mr. Rodriguez.

17 When whatever attorney it was for  
18 Mr. Rodriguez' firm signed the Q3 report of 2016, and I  
19 think it was Mr. Nunez, but whatever attorney it was who  
20 signed the Q3 report from the Rodriguez firm for 2016  
21 attesting that you had not engaged in any prohibited  
22 activities denied you by the Florida Bar, that was a  
23 false statement too, wasn't it?

24 A. Same continuing response.

25 Q. Mr. Romero says that "In or around 2008 or

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1 2009, Careaga became more involved in the day-to-day  
2 recruiting efforts, and I," meaning Romero, "started  
3 managing teams of plaintiff recruiters when they were  
4 called upon, since by that time there was no defined  
5 team of recruiters."

6 That's true, isn't it?

7 A. Same response, sir.

8 Q. Mr. Romero would provide you the information  
9 that he gathered about the plaintiffs that they  
10 recruited, correct?

11 A. Same response.

12 Q. Okay. Luis Calmell worked for you, didn't he?

13 A. Same response, sir.

14 Q. He worked at your direction, didn't he?

15 A. Same continuing response.

16 Q. Mr. Calmell was compensated, wasn't he?

17 A. Same continuing response.

18 Q. On what basis was Mr. Calmell compensated?

19 A. Same response, sir.

20 Q. Was he -- he was, like all the members of the  
21 ground team, compensated on the basis of his performance  
22 as you and the attorneys by who you were employed or for  
23 whom you worked assessed it, correct?

24 A. Same response.

25 Q. Mr. Mesias, Jorge Mesias, he worked for you,

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1 didn't he?

2 A. Same response, sir.

3 Q. And he was paid for his work?

4 A. Same response.

5 Q. People don't work for free, do they?

6 A. Same continuing response, sir.

7 Q. And he was paid with funds that came from the  
8 lawyers by whom -- he was paid with funds that came from  
9 the lawyers from whom you worked, right?

10 A. Same response, sir.

11 Q. And he was paid on a basis of his performance  
12 of these ground team duties as you and those lawyers  
13 assessed them, wasn't he?

14 A. Same continuing response.

15 Q. How about Mr. Picon, Jose Picon?

16 A. Same response.

17 Q. He was employed by you, wasn't he?

18 A. Same response.

19 Q. He was a member of the ground team?

20 A. Same response.

21 Q. And he was compensated?

22 A. Same response.

23 Q. With funds from the United States?

24 A. Same continuing response.

25 Q. Sourced from the law firms?

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1 A. Same continuing response.

2 Q. And based on your assessment and the lawyer's  
3 assessment of his performance and the duties described  
4 by you in your Exhibit 4 affidavit and by the  
5 formalization, correct?

6 A. Same continuing response.

7 Q. I mean, Mr. Careaga, nothing has happened  
8 since August 4th when you submitted Exhibit 4 under oath  
9 has changed your oath, has it, on -- on Exhibit 4?

10 A. Same continuing response, sir.

11 Q. Everything in Exhibit 4 is true?

12 A. Same continuing response.

13 Q. Do you want to change anything about your  
14 declaration from August 4th?

15 A. Same continuing response, sir.

16 Q. How is it that you suppose that your rights  
17 under the Peruvian Constitution to refuse to answer my  
18 questions here are implicated by your August 4th  
19 declaration, Exhibit 4, in this matter?

20 A. I refer to my statement at the outset of this  
21 deposition.

22 Q. Did someone tell you that your oath taken on  
23 August 4th was somehow, I don't know, redeemable,  
24 retractable, if you were to take the position you're  
25 taking here today with regards to your rights under the



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1 Peruvian Constitution?

2 A. Same response, sir.

3 Q. Did Mr. Rodriguez tell you that?

4 A. Same response.

5 Q. Are you taking -- I don't know what we call it  
6 when it's the Peruvian -- are you asserting this right  
7 under -- under the Peruvian Constitution to protect  
8 yourself?

9 A. Same response, sir.

10 Q. Are you taking this position under the  
11 Peruvian Constitution to protect Mr. Rodriguez and the  
12 people at his firm?

13 A. Same response. Same continuing response. I'm  
14 referring to my statement, it speaks for itself.

15 Q. Well, we have your statement in the record,  
16 but your concern is not just for your own position, is  
17 it?

18 A. Same continuing response.

19 Q. Your concern is also for the attorneys at the  
20 Rodriguez Tramont firm with whom you've worked for all  
21 these years?

22 A. Same continuing response.

23 Q. And that's part of what's motivating you to  
24 take this position here today?

25 A. Same continuing response, sir.

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1 Q. Likewise, you're concerned about your  
2 relationship with the Halpren firm, albeit you haven't  
3 worked there for many years, correct?

4 A. Same continuing response.

5 Q. And part of the reason that you're taking the  
6 position that you're taking with respect to the Peruvian  
7 Constitution is to protect the Halpren firm, isn't it?

8 A. Same continuing response.

9 Q. Likewise, the Napoli Shkolnik firm, part of  
10 the reason you're taking the position that you're taking  
11 with respect the Peruvian Constitution is to protect the  
12 Halpren firm, isn't it?

13 A. Same continuing response.

14 Q. And, likewise, Shkolnik Bogart --

15 A. Same --

16 Q. -- part of the reason that you're taking --  
17 you got to let me finish. I know we are in a bit of a  
18 rhythm here.

19 Part of the reason you're taking the position  
20 you're taking with respect to the Peruvian Constitution  
21 is so that you can protect the folks at the Schlichter  
22 Bogard firm?

23 A. Same continuing response.

24 Q. All right. Let's go back to our list.

25 Gean Carlo Cartulin worked for you, didn't he?

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1 A. Same continuing response.

2 Q. And he was paid, wasn't he?

3 A. Same continuing response.

4 Q. And he was -- the funds with which he was paid  
5 were sourced from United States lawyers, weren't they?

6 A. Same continuing response.

7 Q. And you and those lawyers together decided how  
8 much he should get paid based on his performance as a  
9 member of the ground team in Peru, correct?

10 A. Same continuing response.

11 Q. How about Samantha Roman Flores, she was  
12 employed by you, wasn't she?

13 A. Same continuing response.

14 Q. Paid by you?

15 A. Same continuing response.

16 Q. She was paid, wasn't she?

17 A. Same continuing response.

18 Q. And the source of those funds was the United  
19 States law firms?

20 A. Same response, sir.

21 Q. And she was paid on the basis of her  
22 performance as a member of the ground team as assessed  
23 by you and those attorneys, correct?

24 A. Same response, sir.

25 Q. How about Angel Camarena, she was paid by you,

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1 wasn't she?

2 A. Same continuing response.

3 Q. And she was paid for her efforts as a member  
4 of the ground team?

5 A. Same continuing response.

6 Q. And the amount she was paid was on based on  
7 her performance, wasn't it?

8 A. Same continuing response.

9 Q. Gisela Paitan, P-A-I-T-A-N, she was paid for  
10 her efforts as part of the ground team, wasn't she?

11 A. Same continuing response.

12 Q. You supervised those payments, didn't you?

13 A. Same continuing response.

14 Q. With funds from lawyers in the United States?

15 A. Same response, Madam Court Reporter.

16 Q. And Rosario Galarza, she was paid for her  
17 work, wasn't she?

18 A. Same response.

19 Q. You supervised those payments, didn't you?

20 A. Same response, sir.

21 Q. She was paid with funds that were sourced from  
22 the United States lawyers?

23 A. Same response.

24 Q. And she was paid on the basis of her  
25 performance as you and those lawyers assessed it,

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1 correct?

2 A. Same response.

3 Q. We will come back to him. I don't want to get  
4 that -- okay.

5 You know a fellow named David Raul Galarza  
6 Esteban, right?

7 A. Same continuing response.

8 Q. He used to be a recruiter in the ground team,  
9 didn't he?

10 A. Same continuing response.

11 Q. He started working for you in 2014, correct?

12 A. Same continuing response.

13 Q. And -- it's interesting.

14 There was a lull, a hiatus in Mr. Romero's  
15 employment with the ground teams associated with the  
16 Eastern District of Missouri lawsuits, wasn't there?

17 A. Same continuing response.

18 Q. At one point in time he stopped working on the  
19 ground team, and then at a later point in time came back  
20 to work on the ground teams before finally being  
21 discharged altogether, correct?

22 A. Same continuing response.

23 Q. You were instrumental in making the decision  
24 about whether Romero should work for the ground team or  
25 not?

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1 A. Same continuing response.

2 Q. Okay. Galarza was recruited by Romero to be  
3 on the ground team, wasn't he?

4 A. Same continuing response.

5 Q. And you met frequently with Mr. Galarza,  
6 didn't you?

7 A. Same continuing response.

8 Q. Strike that.

9 "Frequently" is not fair.

10 You met from time to time with Mr. Galarza,  
11 didn't you?

12 A. Same continuing response.

13 Q. And at some of those meetings Mr. Rodriguez  
14 was, likewise, present, wasn't he?

15 A. Same continuing response.

16 Q. You often assisted -- most of folks in  
17 La Oroya Huancayo are native and exclusive Spanish  
18 speakers, aren't they?

19 A. Same continuing response.

20 Q. But you are, as we've established, essentially  
21 bilingual, correct?

22 A. Same continuing response.

23 Q. So you would frequently act as a translator  
24 for the family members when they wanted to speak with  
25 someone who wasn't a Spanish speaker, correct?

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1 A. Same continuing response.

2 Q. Now, Mr. Rodriguez is a much better Spanish  
3 speaker than I am. You've heard us both speak pieces of  
4 Spanish, and I'm sure you'll agree, correct, he's a much  
5 better Spanish speaker than I am?

6 A. Same response, sir.

7 Q. But he often would employ you even so in those  
8 meetings to translate Spanish for him, because your  
9 fluency in Spanish is greater than Mr. Rodriguez'  
10 fluency?

11 A. Same continuing response.

12 Q. You're familiar with the e-mail  
13 trabajosoroya@gmail.com.

14 MR. KUNTZ: I'm going to spell it for the  
15 reporter, T-R-A-B-A-J-O-S-O-R-O-Y-A.

16 BY MR. KUNTZ:

17 Q. Trabajosoroya@gmail, you're familiar with that  
18 e-mail, aren't you?

19 A. Same continuing response.

20 Q. You've received many documents at that e-mail,  
21 haven't you?

22 A. Same continuing response.

23 Q. Related to this matter, haven't you?

24 A. Same continuing response.

25 Q. From third parties who are not and never have

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1 been clients of any law firm for which you worked,  
2 correct?

3 A. Same continuing response.

4 Q. In fact, you received e-mails at that e-mail  
5 address and sent e-mails from that e-mail address  
6 through which you effectuated the work you described in  
7 your own declaration, Exhibit 4, and it's further  
8 described in the formalization, Exhibit 5, correct?

9 A. Same continuing response.

10 Q. Likewise, you're familiar with an e-mail  
11 called laoroyadocs, L-A-O-R-O-Y-A-D-O-C-S, @gmail.  
12 You're familiar with an e-mail called laoroyadocs,  
13 aren't you, @gmail, aren't you?

14 A. Same response, sir.

15 Q. And you've sent and received e-mails from that  
16 e-mail address?

17 A. Same response.

18 Q. That e-mail address was one that was  
19 particularly used to transmit documents obtained in Peru  
20 for use or production in the Eastern District lawsuits,  
21 correct?

22 A. Same response.

23 Q. And those -- and e-mails to and from that  
24 address were used in furtherance of the activities that  
25 you described in your own declaration, Exhibit 4, and



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1 the formalization, Exhibit 5, further described,  
2 correct?

3 A. Same continuing response, Madam Court  
4 Reporter.

5 Q. In fact, trabajosoroya@gmail.com was  
6 essentially your work e-mail for your activities in  
7 Peru, wasn't it?

8 A. Same continuing response.

9 Q. In association with laoroyadocs@gmail, you  
10 used and maintained a Google Drive where documents were  
11 uploaded, didn't you?

12 A. Same continuing response.

13 Q. Has that Google Drive been -- does that Google  
14 Drive still exist?

15 A. Same response, sir.

16 Q. You haven't wiped anything off of it, have  
17 you?

18 A. Same response.

19 Q. You first became aware of this 1782 Action  
20 when we served it on you in April of last year, correct?

21 A. Same response.

22 Q. And you're certainly aware of the principal  
23 that once you know litigation is in train, that you  
24 can't destroy documents that might be relevant to  
25 that -- to that litigation, right?

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1 A. Same continuing response.

2 Q. I mean, you were a lawyer for ten years. You  
3 know about that, don't you?

4 A. Same continuing response.

5 Q. Did you destroy any documents from the time  
6 you became aware of this 1782 Action to the present day?

7 A. Same continuing response.

8 Q. Did anyone destroy any documents on your  
9 behalf?

10 A. Same response.

11 Q. Do you know the password to gain access to  
12 laoroyadocs@gmail.com?

13 A. Same continuing response.

14 Q. You do, don't you?

15 A. Same continuing response.

16 Q. You also know the password to obtain access to  
17 trabajosoroya@gmail.com, don't you?

18 A. Same continuing response.

19 Q. Okay. Besides these Gmail accounts, you also  
20 maintained a Hotmail account, didn't you?

21 A. Same continuing response.

22 Q. And you communicated with Mr. Galarza via that  
23 Hotmail account, didn't you?

24 A. Same continuing response.

25 Q. You continue -- you communicated with lots of

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1 people via that Hotmail account, didn't you?

2 A. Same response.

3 Q. And you received documents via that Hotmail  
4 account?

5 A. Same response.

6 Q. Okay. In 2016 you tasked Mr. Galarza and some  
7 other members of the recruiting team to go into the  
8 homes of potential plaintiffs to interview them and have  
9 them fill out and sign documents, didn't you?

10 A. Same response, sir.

11 Q. And then those documents that he obtained were  
12 uploaded to the Google Drive that's associated with  
13 laoroyadocs@gmail.com, right?

14 A. Same continuing response.

15 Q. And they're all still there, aren't they?

16 A. Same continuing response.

17 Q. You didn't produce to our office any e-mails  
18 associated with either of those two Gmail addresses, did  
19 you?

20 A. Same continuing response.

21 Q. Did you produce any of -- did you provide any  
22 e-mails from either of those two sources to  
23 Mr. Rodriguez for work product review?

24 A. Same continuing response.

25 Q. How about to Mr. Halpren for work product

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1 review?

2 A. Same response.

3 Q. Of course, if there were responsive documents  
4 in either of those two e-mails accounts, there isn't any  
5 question that you'd have been required under the  
6 subpoena to produce them barring a privilege assertion,  
7 correct?

8 A. Same response.

9 Q. You recall telling me a little while ago that  
10 you were doing something out of respect for the Southern  
11 District of Florida?

12 A. Is there a question there?

13 Q. Yes.

14 Do you recall telling me a little while ago  
15 that you were doing something, I believe it was looking  
16 at a document, that out of respect for the Southern  
17 District of Florida?

18 A. I have the utmost respect for that court.

19 Q. Do you recall telling me that a few minutes  
20 ago?

21 A. I'll defer exactly what I said to the court  
22 reporter.

23 Q. Okay. But you do have the utmost respect for  
24 the Southern District of Florida?

25 A. Certainly.

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1 Q. And for Judge Louis, in particular?

2 A. Certainly.

3 Q. And so when Judge Louis directed you to  
4 respond to the subpoena and to find and provide  
5 documents that were responsive to the document request  
6 in the subpoena, you took that obligation seriously,  
7 didn't you?

8 A. I'll continue now to defer to by statement at  
9 the outset of this deposition.

10 Q. So why were you answering my question a minute  
11 ago, but now you're going to defer?

12 A. I'll continue now to refer to my statement at  
13 the outset of this deposition.

14 Q. Okay. Mr. Galarza says that you sent him  
15 money. Did you use Western Union to do that?

16 A. I'll refer to my statement.

17 Q. Did you ever give Mr. Galarza cash "efectivo"?

18 A. Same continuing response.

19 Q. Did you ever give him soles?

20 A. Same continuing response.

21 Q. Did you ever give him dollars?

22 A. Same continuing response.

23 Q. Did you ever buy him a meal?

24 A. Same continuing response.

25 Q. Cup of coffee?

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1 A. Same continuing response.

2 Q. Now, you created a quota system for the  
3 recruiters, didn't you?

4 A. Same continuing response.

5 Q. They were expected, whatever their job might  
6 be, to satisfy that quota, right?

7 A. Same continuing response.

8 Q. So for recruiters who were required to collect  
9 plaintiff profile sheets, you had a quota for how many  
10 plaintiff profile sheets they should have obtained,  
11 correct?

12 A. Same continuing response.

13 Q. For recruiters who were obtaining next friend  
14 petitions -- you know what a next friend petition is,  
15 don't you?

16 A. Same response, sir.

17 Q. You know what a plaintiff profile sheet is in  
18 the context of the Eastern District of Missouri cases,  
19 don't you?

20 A. Same response, sir.

21 Q. And so with respect -- just so I'm clear,  
22 you're not communicating with anybody about this  
23 deposition, are you?

24 A. Absolutely not.

25 Q. Okay. Because you understand that that would

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1 be improper?

2 A. No. I look at my phone from time to time in  
3 case my children are contacting me.

4 Q. We all do it. Absolutely understandable.

5 A. That's the reason why I just looked --

6 Q. I've done it myself since we've been in this  
7 depo. I just want to make sure.

8 So back to my question. With regard -- and  
9 apologies if I fall back a little too far.

10 With regard to next friend petitions, you  
11 created a quota whereby the recruiters whose job it was  
12 to help obtain next friend petitions were expected to  
13 meet that quota, correct?

14 A. Same continuing response.

15 Q. Recruiters who did very well got paid more,  
16 didn't they?

17 A. Same continuing response.

18 Q. Okay. You know Greysi Paola Yupanqui Vilca?

19 MR. KUNTZ: Ready?

20 Greysi is G-R-E-Y-S-I. Paola, P-A-O-L-A.

21 Yupanqui -- wherever you are, Ms. Yupanqui, I hope  
22 I'm pronouncing it correctly, is Y-U-P-A-N-Q-U-I,  
23 and the matronymic name is Vilca, V-I-L-C-A.

24 BY MR. KUNTZ:

25 Q. You know Ms. Yupanqui, don't you?

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1 A. I'll continue to refer to my statement.

2 Q. She was a recruiter for a time, wasn't she?

3 A. Continuing response. Same continuing  
4 response.

5 Q. Okay. You and Greysi Yupanqui, you do not get  
6 along anymore, do you?

7 A. Same continuing response.

8 Q. How about --

9 MR. RODRIGUEZ: Robert, excuse me.

10 What time did you say -- I have somewhat of an  
11 emergency that it can wait 10 or 15 minutes --

12 MR. KUNTZ: So I did plan to break at 12:30  
13 for lunch.

14 MR. RODRIGUEZ: That's fine.

15 Thank you.

16 MR. KUNTZ: Will that work?

17 MR. RODRIGUEZ: Thank you.

18 MR. KUNTZ: I don't want to get in the way of  
19 anybody's emergency.

20 MR. RODRIGUEZ: No. That's good.

21 MR. KUNTZ: Okay. Yeah, we'll break at right  
22 about 12:30 for lunch.

23 And you want to take just a half an hour,  
24 Mr. Careaga?

25 THE WITNESS: That's fine.



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1 MR. KUNTZ: Okay. We can do that.

2 BY MR. KUNTZ:

3 Q. Okay. Back to Greysi Yupanqui -- hold on.

4 Ms. Yupanqui says that she is afraid of you.

5 Does she have reason to be afraid of you?

6 A. I'll continue to refer to my statement.

7 Q. That time with a smile, though. Interesting.

8 Okay. Does Ms. Yupanqui have reason to be

9 afraid of you?

10 A. I continue to refer to my statement.

11 Q. She does, doesn't she?

12 A. I'll continue to refer to my statement.

13 Q. How about Nohely Beatriz Yupanqui Vilca?

14 MR. KUNTZ: And Nohely is N-O-H-E-L-Y,

15 Beatriz -- Beatriz, B-E-A-T-R-I-Z, Yupanqui Vilca.

16 BY MR. KUNTZ:

17 Q. You know her too, don't you?

18 A. Same continuing response.

19 Q. Greysi Yupanqui assisted in the mass  
20 notarization of documents outside the presence of the  
21 signers, didn't she?

22 A. Same continuing response.

23 Q. A notary in Peru is -- this is an imprecise  
24 term, but it's a bigger deal than it is in the United  
25 States, isn't it?

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1 A. Same continuing response.

2 Q. Notaries are considered public officials in  
3 Peru?

4 A. Same continuing response.

5 Q. And the notarization process is necessary for  
6 many more things than it is necessary for here, isn't  
7 it?

8 A. Same continuing response.

9 Q. And Peru has extremely detailed and strict  
10 requirements with regard to the notarization process,  
11 doesn't it?

12 A. Same continuing response.

13 Q. Those are procedures and laws regarding the  
14 notary process with which you are intimately familiar,  
15 aren't you?

16 A. Same response, sir.

17 Q. But you employed Ms. Yupanqui for a time to  
18 help to completely subvert all of those requirements,  
19 didn't you?

20 A. Same continuing response.

21 Q. Okay. She would literally carry bulk  
22 documents to the notary for notarization outside the law  
23 and requirements of Peruvian notary practice, wouldn't  
24 she?

25 A. Same continuing response.

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1 Q. Okay. Back to Nohely Yupanqui.

2 She's somebody who always called you

3 "Dr. Victor," didn't she?

4 A. Same continuing response.

5 Q. She's not a fan of yours anymore, is she?

6 A. Same continuing response.

7 Q. Nor are you of her?

8 A. Same continuing response.

9 Q. Does Nohely Yupanqui have reason to be afraid  
10 of you?

11 A. Same continuing response.

12 Q. You don't want to just tell the Yupanqui women  
13 that they don't have to be afraid of you?

14 A. Same continuing response.

15 Q. So they should draw from that whatever  
16 inference they should draw from your refusal to answer?

17 A. Same continuing response, sir.

18 Q. Okay. You're familiar with --

19 MR. KUNTZ: This is a more natural break.

20 Let's break here and let's call it 30 minutes,  
21 which will be quarter to 1:00 --

22 MR. RODRIGUEZ: Great. Thank you.

23 MR. KUNTZ: -- and we'll come back after that.

24 THE VIDEOGRAPHER: Off record 12:13 p.m.

25 (There was a discussion off of the record.)

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1 THE VIDEOGRAPHER: On record 12:57 p.m.

2 BY MR. KUNTZ:

3 Q. Mr. Careaga, at the very outset of the  
4 deposition, you read from a written statement. With  
5 your permission, I would like to make that written  
6 statement an exhibit to the deposition so that we have  
7 an absolutely clear record. Is that okay? We'll make  
8 copies and return your original.

9 A. I will refrain from providing you that  
10 document.

11 Q. You're not going to give me the document from  
12 which read --

13 A. That is correct.

14 Q. -- your statement?

15 Okay. Sir, when you first showed up this  
16 morning, you had a brief chat with my receptionist,  
17 didn't you?

18 A. I may have.

19 Q. Okay. And when she asked you to sign the  
20 visitor's log that we maintain here with your name, do  
21 you recall what you told her?

22 A. I did not hear anything like that.

23 And I'll continue now to refer to my  
24 statement, because you're wasting your time asking me  
25 questions like that.

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1 Q. Okay. When she asked you to sign the  
2 visitor's log, do you recall what you told her?

3 A. I was not asked that.

4 Q. Okay. Didn't you tell my receptionist, I'm  
5 the star of the show?

6 A. I do continue to refer to my opening  
7 statement.

8 Q. Okay. But that is what you said, though,  
9 wasn't it?

10 A. I continue to refer to my opening statement.

11 Q. Okay. You're familiar with a program in Peru,  
12 aren't you, called "Vaso de Leche," V-A-S-O --

13 A. Same response, Madam Court Reporter.

14 Q. -- D-E, L-E-C-H-E.

15 And you know that the "Vaso de Leche" program  
16 is a program designed to provide food resources and  
17 other things to needy people in Peru, correct?

18 A. Same response, Madam Court Reporter.

19 Q. Particularly that you know that that program  
20 is directed at children in need, don't you?

21 A. Same response, Madam Court Reporter.

22 Q. Okay. Did you -- so Mr. Romero told you that  
23 a woman by the name of Yolanda Zurita in association  
24 with Mr. Galarza, about whom we've spoken already, had a  
25 plan to use the "Vaso de Leche" program as leverage to

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1 recruit plaintiffs into the Eastern District of Missouri  
2 lawsuits, didn't you?

3 A. Same response.

4 Q. By the way, while we were on break, did you  
5 speak with Mr. Rodriguez?

6 A. I had lunch with Mr. Rodriguez.

7 Q. Oh, okay. So you had lunch with  
8 Mr. Rodriguez. And what did you and Mr. Rodriguez  
9 discuss?

10 A. None of your concern.

11 Q. Oh, it absolutely is my concern, sir. While  
12 you were on break from this deposition, did you discuss  
13 this deposition?

14 A. Nope.

15 Q. You had lunch with Mr. Rodriguez on a break  
16 from this deposition, but the two of you didn't discuss  
17 this deposition?

18 A. That is correct.

19 Q. Mr. Rodriguez didn't ask you about the  
20 deposition?

21 A. That is correct.

22 Q. And you didn't tell Mr. Rodriguez anything  
23 about the deposition?

24 A. That is correct.

25 Q. Okay. Did you all call Mr. Halpren while you

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1 were on break?

2 A. Not that I'm aware of. I certainly did not.

3 Q. Did you speak to Mr. Halpren while you were on  
4 break?

5 A. No, I did not.

6 Q. Okay. Besides Mr. Rodriguez and any wait  
7 staff that might have been at whatever restaurant you  
8 went to, with whom else did you speak while you were on  
9 break from the deposition?

10 A. I did not speak to anybody.

11 Q. So just Mr. Rodriguez for 40 minutes or so,  
12 but not a word about the deposition?

13 A. That is correct.

14 Q. Okay. What did you speak about?

15 A. Other matters.

16 Q. What other matters?

17 A. None of your concern, sir.

18 Q. Mr. Rodriguez is not your attorney, is he?

19 A. No, he's not.

20 Q. So on what basis are you refusing to answer my  
21 question about what you spoke to Mr. Rodriguez about  
22 during the break of this deposition?

23 A. Over business matters that have nothing to do  
24 with this deposition.

25 Q. Okay. Tell me what those other business

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1 matters --

2 A. None of your concern, sir.

3 Q. On what basis are you refusing to answer my  
4 question?

5 MR. RODRIGUEZ: Any conversations that I had  
6 with Careaga are work product in nature. They had  
7 nothing to do with this deposition. And I would  
8 assert a work product protection over the  
9 discussions that we had. It had nothing to do with  
10 this deposition.

11 What is that?

12 MR. KUNTZ: I don't know. It's a  
13 speakerphone. I have no idea.

14 Mr. Rodriguez, I'm going to move to strike  
15 your testimony. I'm going to once again  
16 respectfully request you --

17 MR. RODRIGUEZ: I have a right as an  
18 intervener, I have a right to assert work product  
19 protection --

20 MR. KUNTZ: Absolutely. Let me finish.

21 MR. RODRIGUEZ: That's all I'm -- that's all  
22 I'm asserting.

23 MR. KUNTZ: Thank you.

24 I respectfully request that if you're going to  
25 assert any objection under the work product



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1 privilege, that you simply assert it rather than --  
2 rather than testifying, as you did about the events  
3 that I'm asking about and then asserting, that's  
4 the distinction I want to make. Okay. I think  
5 your role is limited to those objections. Okay.

6 BY MR. KUNTZ:

7 Q. So where did you eat?

8 A. Across the street.

9 Q. Which place? Bulla?

10 A. I don't know.

11 Q. Okay. What did you have?

12 A. Is that relevant?

13 Q. What did you have for lunch, Mr. Careaga?

14 A. I had a sandwich.

15 Q. What was on the sandwich?

16 A. A caprese.

17 Q. Caprese?

18 A. Yes.

19 Q. Those have usually got mozzarella and tomato  
20 and basil.

21 A. If you say so.

22 Q. Well, that's just usually. I wondered what  
23 was on this sandwich.

24 A. I think that was the case.

25 Q. Who paid for lunch?

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1 A. None of your concern, sir.

2 Q. Again, I'm asking you, who paid for lunch?

3 And if you're not going to answer, I would like for you  
4 to tell me on what basis you're refusing to answer my  
5 question.

6 A. None of your concern.

7 Q. Sir, on what basis are refusing to answer my  
8 question of who paid for lunch?

9 A. Okay. I'll refer to my initial statement.

10 Q. Because you believe who paid for lunch is in  
11 some way possibly going to incriminate you in Peru?

12 A. That's what you think.

13 Q. I'm asking you a question, sir.

14 Who paid for lunch?

15 A. I'll refer to my statement.

16 Q. So your basis for not telling me who paid for  
17 the lunch you had with Mr. Rodriguez, which, of course,  
18 we both know matters of payment are not subject to the  
19 work product privilege, your basis for not answering the  
20 question of who paid for lunch with Mr. Rodriguez is  
21 your -- is your statement that you gave at the beginning  
22 of the deposition that you won't allow me to enter as an  
23 exhibit?

24 A. Probably, because it's totally irrelevant in  
25 the proceedings that are taking place in Peru, which is

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1 the subject of the 1782 --

2 Q. Yes, sir. But irrelevance isn't really an  
3 objection that allows you to refuse to answer. So maybe  
4 now that you've styled this as a relevance objection,  
5 you want to reconsider and tell who paid for lunch when  
6 you and Mr. Rodriguez went to lunch.

7 A. I said it's none of your concern, sir.

8 Let's move on.

9 Q. So I'm clear, is your basis that it's none of  
10 my concern, that it's irrelevant, or that you are doing  
11 it on the strength of the Peruvian Constitutional  
12 protections that you assert?

13 A. It may be -- it may be on all of them or it  
14 may be one or some of them.

15 Q. Which one is it, sir?

16 A. I -- move on, Mr. Kuntz.

17 Q. I'm not going to move on until you answer my  
18 question, Mr. Careaga. That is what we are here. I ask  
19 questions and you answer them.

20 A. I already gave you my answer, it's none of  
21 your concern.

22 Q. All right. So it simply is just going to not  
23 answer?

24 A. I'm not going to answer that.

25 Q. But without telling me what the basis is?

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1 A. I'm not going to answer that.

2 Q. Okay. Got it.

3 When we come to other questions you won't  
4 answer, since we kind of gone down this route, I need  
5 you to tell me what basis we're on, and then maybe we  
6 can get back in a rhythm.

7 A. We'll take it one question at a time.

8 Q. Yes, we will.

9 So when Ms. Zurita came to you with  
10 Mr. Galarza to suggest using the "Vaso de Leche" program  
11 as a means to leverage recruiting efforts on the ground  
12 in Peru, you thought that was a good idea, didn't you?

13 A. I refer to my statement.

14 Q. And you operationalized, didn't you?

15 A. I refer to my statement.

16 Q. You would have the ground recruiters tell  
17 parents of children that if they participated in, say,  
18 blood testing, they could get school supplies, correct?

19 A. Same -- same continuing response.

20 Q. You would tell them that they could get other  
21 items of material worth, didn't you?

22 A. Same continuing response.

23 Q. You would tell them that they could get food  
24 assistance, wouldn't you?

25 A. Same response.

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1 Q. The recruiters were instructed, weren't they,  
2 to tell potential clients about the "Vaso de Leche"  
3 program without telling them about the lawsuits in Peru,  
4 correct?

5 A. Same continuing response.

6 Q. Or, at the very least, without telling them  
7 about the lawsuits in Peru until they'd come for the  
8 benefit to be conferred by the "Vaso de Leche" program,  
9 correct?

10 A. Same response.

11 Q. Okay. In fact, of a lot of these families who  
12 were promised food or goods never received it, did they?

13 A. Same response, sir.

14 Q. Okay. In addition to using the "Vaso de  
15 Leche" program, as I've described here and as set forth  
16 in some detail in the formalization Exhibit 5 for this  
17 deposition, you also were able to use the "Vaso de  
18 Leche" program as a means to collect data to identify  
19 potential clients, weren't you?

20 A. Same response, sir.

21 Q. Okay. In all of this, particularly this "Vaso  
22 de Leche" leveraging effort you were the boss in Peru,  
23 weren't you?

24 A. Same response, sir.

25 Q. And your boss was variously Frank Rodriguez,

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1 yes?

2 A. Same response.

3 Q. Louis Thaler?

4 A. Same continuing response.

5 Q. Okay. Have you ever heard of "Mantaro Revive"  
6 project?

7 A. Same continuing response.

8 MR. KUNTZ: M-A-N-T-A-R-O, R-E-V-I-V-E.

9 BY MR. KUNTZ:

10 Q. The "Mantaro Revive" project is a food  
11 assistance program, isn't it?

12 A. Same continuing response.

13 Q. Do you know Cardinal Pedro Barreto?

14 A. Same continuing response.

15 Q. You do know him, right?

16 A. Same continuing response.

17 Q. He's the Arch Bishop of Huancayo, isn't he?

18 Or was -- he was the Arch Bishop of Huancayo, wasn't he?

19 A. Same continuing response.

20 Q. Okay. And the Catholic church is a pretty  
21 powerful force in the Andean Foothills, isn't it?

22 A. Same continuing response.

23 Q. Cardinal Barreto is a person of great regard  
24 among the citizens of Peru who live in the Andean  
25 Foothills, isn't he?

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1 A. Same continuing response.

2 Q. You met with Cardinal Barreto, didn't you?

3 A. Same continuing response.

4 Q. Was Mr. Rodriguez ever present at a meeting  
5 with Cardinal Barreto?

6 A. Same response.

7 Q. Was Mr. Shkolnik ever present at a meeting  
8 with Cardinal Barreto?

9 A. Same response.

10 Q. Was Jerry Schlichter ever present at a meeting  
11 with Cardinal Barreto?

12 A. Same response.

13 Q. Was Jay Halpren ever present at a meeting with  
14 Cardinal Barreto?

15 A. Same continuing response.

16 Q. Was anybody from the law firms of Rodriguez  
17 Tramont, Napoli Shkolnik, the Halpren firm or Schlichter  
18 Bogard ever present at a meeting with the Cardinal while  
19 you were there?

20 A. Same continuing response.

21 Q. Do you know if anyone from those firms ever  
22 met with the Cardinal without you being there?

23 A. Same continuing response.

24 Q. Did -- so Richard Romero told you that just as  
25 with the "Vaso de Leche" program, you'd be able to

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1 leverage the "Mantaro Revive" project in exactly the  
2 same way to recruit secure and clients, didn't he?

3 A. Same continuing response.

4 Q. And you thought that was a good idea?

5 A. Same response, sir.

6 Q. And you helped to manage all that because you  
7 were the boss in Peru --

8 A. Same response, sir.

9 Q. -- weren't you?

10 You got to slow down a little bit. I like our  
11 rhythm, but you got to let me finish the question,  
12 because it's not possible to type two people's words at  
13 once.

14 A. I apologize to the court reporter.

15 Q. As so I -- I get a little speedy too.

16 And your boss when you were bossing this  
17 leverage of the "Mantaro Revive" project, your boss was  
18 Frank Rodriguez, wasn't it?

19 A. Same continuing response.

20 Q. Or sometimes Louis Thaler, depending on --

21 A. Same response.

22 Q. Sometimes Louis Thaler, depending on the time?

23 A. Same response.

24 Q. There we go.

25 How about a fellow by the name of Moises Guia



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1 Pianto, M-O-I-S-E-S, G-U-I-A, P-O- -- P-A-N-T-O [sic],

2 Pianto. Do you know Moises Guia?

3 A. Same continuing response.

4 Q. Okay. You do know him, don't you?

5 A. Same response.

6 Q. You've spoken with him in person on several  
7 occasions?

8 A. Same response.

9 Q. Spoken with him by other means?

10 A. Same response.

11 Q. Let me show you a letter.

12 MR. KUNTZ: I'm going to mark this as Exhibit  
13 Number 13.

14 I think that's right.

15 Yeah, Exhibit 13.

16 (Thereupon, Letter dated August 28, 2017, was  
17 marked as Exhibit Number 13 for identification.)

18 BY MR. KUNTZ:

19 Q. Once again, the Spanish language original is  
20 in the back and the translation of the Spanish language  
21 original is on the front. Just so the record is super  
22 clear, I don't think this is a certified translation,  
23 but you read Spanish language, don't you, sir?

24 A. I believe you gave me a second copy.

25 Q. Okay. Thanks.

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1 Save a tree.

2 You speak --

3 MR. RODRIGUEZ: What exhibit is it? I'm  
4 trying to --

5 MR. KUNTZ: 13.

6 BY MR. KUNTZ:

7 Q. You speak, read, and write Spanish, don't you?

8 A. Same continuing response.

9 Q. How does acknowledgment of your bilingual  
10 fluency come under the privilege that you're asserting  
11 to refuse to answer here today?

12 A. Same response, sir.

13 Q. Okay. Have you ever seen this letter before?

14 A. Same response.

15 Q. Did you have a hand in drafting this letter?

16 A. Same response.

17 Q. Did you ever see any earlier drafts of this  
18 letter?

19 A. Same response, sir.

20 Q. Did you give Mr. Guia anything in exchange for  
21 writing and sending this letter?

22 A. Same response.

23 Q. You know who Fernandez Zavala Lombardi, don't  
24 you?

25 A. Same response, sir.

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1 MR. KUNTZ: Zavala with a V at the end.

2 BY MR. KUNTZ:

3 Q. You met with him on occasion, haven't you?

4 A. Same response, sir.

5 Q. Spoken with him in person?

6 A. Same response.

7 Q. And you've spoken with him by other means?

8 A. Same response.

9 Q. What did you hope that the Guia letter of 28th  
10 August 2017 would accomplish?

11 A. Same response, sir.

12 Q. In August of -- in August of 2017, you were  
13 working for the Rodriguez firm, correct?

14 A. Same response.

15 Q. Were you a W-2 employee or were you a 1099?

16 A. Same continuing response.

17 Q. But irrespective of your tax status, you  
18 worked for the law firm, correct?

19 A. Same continuing response.

20 Q. Mr. Rodriguez have a hand in preparation of  
21 this letter by Mr. Guia?

22 A. Same response.

23 Q. Who's Israel Lazo?

24 A. Same response, sir.

25 Q. Let's take a look at a letter from Mr. Lazo.

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1 This is Exhibit 14.

2 (Thereupon, Letter from Israel Lazo Juica was  
3 marked as Exhibit Number 14 for identification.)

4 BY MR. KUNTZ:

5 Q. Now, in this case there --

6 MR. KUNTZ: Sorry.

7 THE COURT REPORTER: That's okay.

8 Go ahead.

9 "Now, in this case" --

10 BY MR. KUNTZ:

11 Q. Now, in this case of Exhibit 14, I do not have  
12 the English language translation, but that's not a  
13 problem because you speak, read, and write the Spanish  
14 language, correct?

15 A. Same response, sir.

16 Q. All right. Have you seen this letter from  
17 Mr. Zavala Lombardi before?

18 A. Same response, sir.

19 Q. I'm sorry.

20 Have you seen this letter to Mr. Zavala  
21 Lombardi?

22 A. Same response.

23 Q. And did you have any hand in helping Mr. Lazo?

24 MR. KUNTZ: And it's Israel Lazo Juica, last  
25 name J-U- -- or matronymic is J-U-I-C-A.

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1 BY MR. KUNTZ:

2 Q. Did you have any hand in preparing the letter  
3 from Mr. Zavala to Mr. Lazo?

4 A. Same response.

5 Q. What did you hope that the letter would  
6 accomplish?

7 A. Same response, sir.

8 Q. Did you give -- did you give Mr. Lazo anything  
9 in exchange for writing this letter?

10 A. Continue to refer to my statement at the  
11 inception of this deposition.

12 Q. Did you ever meet Mr. Lazo for lunch?

13 A. Same response.

14 Q. Who pays for lunch when you meet with  
15 Mr. Lazo?

16 A. Same response, sir.

17 Q. All right. You know a fellow by the name of  
18 Miguel Curi, don't you?

19 A. Same response, sir.

20 Q. In fact -- in fact, Mr. Curi is a member of  
21 the fourth tier of the "los tramitadores de plomo,"  
22 isn't he?

23 A. Same response, sir.

24 Q. Okay. You met him in Peru, didn't you?

25 A. Same response.

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1 Q. Okay. And you employed Mr. Curi's services  
2 going back to when you were still an attorney, correct?

3 A. Same response, sir.

4 Q. Have you ever been barred anywhere other than  
5 the state of Florida?

6 A. Same response, sir.

7 Q. How would it be -- we'll do this once in a  
8 while.

9 How would it be that telling me where you've  
10 been barred or that you've only been barred in the state  
11 of Florida would implicate the Peruvian prosecution upon  
12 the strength of which you're asserting your privilege  
13 not to answer?

14 A. I do not know, and I continue to refer to my  
15 statement.

16 Q. So Mr. Curi was -- Mr. Curi was a man with a  
17 particular set of skills, wasn't he?

18 A. Same continuing response, Madam Court  
19 Reporter.

20 Q. Okay. Not a movie fan.

21 Okay. And among Mr. Curi's particular set of  
22 skills was an ability to create fake official stamps,  
23 wasn't it?

24 A. Same continuing response.

25 Q. Because in Peru it is literally the case that

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1 there is more red tape than there is here in the United  
2 States, isn't there?

3 A. Same continuing response.

4 Q. Most official signatures of an institution or  
5 a person are accompanied by an official stamp, aren't  
6 they?

7 A. Same continuing response.

8 Q. And those stamps bear certain indicia such as  
9 identification numbers, facsimiles of signatures and  
10 other information particular to the person signing them,  
11 don't they?

12 A. Same continuing response.

13 Q. Or to the organization that -- that is signing  
14 off with the stamp, correct?

15 A. Same response, sir.

16 Q. Many of these -- besides these stamps, we'll  
17 look at some stamps, there are also official seals that  
18 are employed in Peru on documents, aren't there?

19 A. Same continuing response.

20 Q. And Mr. Curi, among his particular set of  
21 skills, had a skill at creating fake seals, didn't he?

22 A. Same continuing response.

23 Q. And in addition to the stamps and the seals  
24 that we've spoken about, there's a special set of stamps  
25 that notary publics use, correct?

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1 A. Same continuing response.

2 Q. And Mr. Curi was adept at manufacturing fake  
3 notary public seals, wasn't he?

4 A. Same continuing response.

5 Q. And he employed all of these skills of  
6 manufacturing at your direction, didn't he?

7 A. Same continuing response.

8 Q. And, of course, you were working at the  
9 delegation of the lawyers in the United States, weren't  
10 you?

11 A. Same response.

12 Q. And under the protocols that they set forth,  
13 correct?

14 A. Same response.

15 Q. Just as you stated in your sworn statement to  
16 this Court on August 4th, correct?

17 A. Same response.

18 Q. Let's take a look at some fake stamps and  
19 seals.

20 MR. KUNTZ: This is Exhibit Number 15.

21 (Thereupon, Stamps and seals were marked as  
22 Exhibit Number 15 for identification.)

23 BY MR. KUNTZ:

24 Q. Now, this isn't -- this isn't a document with  
25 writing, this is a document with pictures. It only runs



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1 to four pages, so I'll ask you to look at all four  
2 pages, please, so that we can discuss them.

3 MR. RODRIGUEZ: 15?

4 MR. KUNTZ: Exhibit 15.

5 BY MR. KUNTZ:

6 Q. Sir, have you ever seen any of these --

7 MR. KUNTZ: See, we all have personal lives  
8 that interfere. I'm going to send a note and let  
9 my boy know that I'm in a depo. In depo.

10 BY MR. KUNTZ:

11 Q. Have you ever seen the -- you have seen the  
12 fake stamps that are depicted in the picture on the  
13 first page, haven't you?

14 A. Same response, sir.

15 Q. Okay. And you're aware that these fake stamps  
16 are among the very fake stamps that were used to falsely  
17 officialize documents that had been produced in the  
18 Eastern District litigation, aren't you?

19 A. Same response.

20 Q. Okay. The thing is, Mr. Curi didn't always do  
21 a perfect job, did he?

22 A. Same response, sir.

23 Q. So when we look at the second page -- when we  
24 look at the second page, I'm inviting you to look at the  
25 second page.

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1           When we look at the second page, we see that  
2     from time to time Mr. Curi would make a mistake,  
3     wouldn't he?

4           A.     Same response, sir.

5           Q.     For example, here proposes that he -- what  
6     proposing to be the stamp of someone named Paulina Rojas  
7     Llacua. I can't even pronounce this. Llacua,  
8     L-L-A-C-U-A. Thankfully I'm going to call her  
9     Ms. Rojas.

10           When he purported to create a stamp for  
11    Ms. Rojas, he got her national ID number wrong, didn't  
12    he?

13           A.     Same response, sir.

14           Q.     If you'll look at the number in the stamp, and  
15    then look at the number in the certification, you'll see  
16    that those are not the same number, are they?

17           A.     Same response.

18           Q.     And you know, of course, from your extensive  
19    travels in Peru that Peruvian nationals all have a DNI,  
20    a National Identity Card, don't they?

21           A.     Same response, sir.

22           Q.     In some countries, I think Mexico they refer  
23    to this as a "cédula." You're familiar with that  
24    practice, aren't you?

25           A.     Same response, sir.

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1 Q. And that that National ID carries with it a  
2 unique number individualized to the person with that  
3 National ID, correct?

4 A. Same response, sir.

5 Q. So it would never be the case, would it, that  
6 someone's official stamp would fail to have the correct  
7 National ID number, would it?

8 A. Same response.

9 Q. That couldn't just happen by accident, could  
10 it?

11 A. Same response, sir.

12 Q. It happened because Mr. Curi made a mistake?

13 A. Same response.

14 Q. All right. And then it's that very stamp that  
15 purports to be from Ms. Rojas -- let's look at page 3.  
16 I brought the magnifying glass for a reason. I don't  
17 know how your eyesight is, mine finds it a little  
18 difficult.

19 When you look at page 3, there's a document on  
20 the top that says "constancia," and at the bottom of  
21 that -- image of that document there is some tiny little  
22 numbers. I'm going to give you my magnifying glass so  
23 you can --

24 A. I don't need it.

25 Q. Oh, you can see? Oh, man, you got better eyes

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1 than I do.

2 So at the bottom of that document there's a  
3 number that starts with "PLF," and I won't read the  
4 whole number into the record.

5 Do you see that number?

6 A. I'm not going to -- I'm not going -- I'm going  
7 to continue to defer to my statement. I'm not answering  
8 any questions regarding any documents.

9 Q. Right. I'm just asking if you see the number  
10 that I'm referring to.

11 A. There are numbers there.

12 Q. Okay. With your -- with your permission, I'm  
13 just going to indicate these are the numbers that I mean  
14 right there.

15 A. There are numbers are.

16 Q. There are numbers, you agree with me?

17 A. There are numbers there.

18 Q. There are numbers there. Okay. Great.

19 Those numbers are, in fact, a Bates number  
20 from production by the plaintiffs to the defendants in  
21 one of the Eastern District of Missouri litigations  
22 either Reed or Collins, correct?

23 A. If that's the case.

24 Q. Well, that is the case, isn't it?

25 A. I continue to refer to my statement.

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1 Q. Well, let's try first principals. You were a  
2 lawyer for a long time and a paralegal now for a while,  
3 you know what Bates numbers are, don't you?

4 A. I continue to refer to my initial statement.

5 Q. Bates numbers are the numbers that are affixed  
6 to documents shared in court proceedings to individually  
7 identify each page of the document, aren't they?

8 A. Same response.

9 Q. Sir, how would it be that acknowledging the  
10 nature and purpose of Bates numbers would implicate the  
11 protections that you're claiming under Peruvian  
12 Constitution?

13 A. Same response, sir.

14 Q. So it turns out that this fake stamp was, in  
15 fact, affixed to a document produced by the plaintiffs  
16 in this litigation?

17 A. Same response, sir.

18 Q. And you were aware that documents for  
19 production in this litigation were getting fake stamps,  
20 weren't you?

21 A. Same response, sir.

22 Q. And you would never have undertaken something  
23 as dramatic as the step of supervising fake stamps being  
24 affixed to documents provided to the Court without  
25 letting Mr. Rodriguez know about it, would you have?

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1 A. Same response, sir.

2 Q. You don't recall that you told me that you  
3 have respect for the Southern District of Florida. Do  
4 you have respect for the Eastern District of Missouri?

5 A. I sure do.

6 Q. So you would never have -- so how do you  
7 square your respect for the Eastern District of Missouri  
8 with your supervision of people who were producing and  
9 affixing fake stamps for documents for production in the  
10 Eastern District of Missouri?

11 A. Same continuing response.

12 Q. Can you square them?

13 A. Same continuing response, Madam Court  
14 Reporter.

15 Q. You really can't square them, can you?

16 A. Same continuing response.

17 Q. So we've seen some stamps, now we're going to  
18 see some forged forgery seals. Let's go to them.

19 The last page. Would you please look at the  
20 last page of Exhibit 15?

21 Mr. Curi manufactured the fake notary seal  
22 depicted in that picture, didn't he?

23 A. Same continuing response.

24 Q. And that fake notary seal was used to notarize  
25 documents for use in the Eastern District of Missouri

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1 litigation, wasn't it?

2 A. Same continuing response.

3 Q. Now, see that -- okay.

4 Gotcha.

5 It can't be that you didn't know about these  
6 fake stamps, can it?

7 A. Same continuing response.

8 Q. Because you closely supervised the important  
9 work of Mr. Curi, didn't you?

10 A. Same continuing response.

11 Q. You closely supervised the work of Richard  
12 Romero, didn't you?

13 A. Same continuing response.

14 Q. And Mr. Rodriguez, as he's obligated to do,  
15 closely supervised your work on behalf of his law firm,  
16 didn't he?

17 A. Same continuing response.

18 Q. You didn't conceal what you were doing from  
19 Mr. Rodriguez, did you?

20 A. Same continuing response.

21 Q. Are you concerned at all that your actions may  
22 have caused some trouble for Mr. Rodriguez?

23 A. Same continuing response.

24 Q. Okay. Mr. Romero says that as your  
25 relationship progressed, you began to harass him and

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1 pressure him to recruit plaintiffs at any cost. That  
2 happened, didn't it?

3 A. Same continuing response.

4 Q. Okay. It is not always an easy thing to  
5 obtain official records from institutions in Peru, is  
6 it?

7 A. Same continuing response.

8 Q. For example, medical records can be difficult  
9 to obtain?

10 A. Same continuing response.

11 Q. Educational records can be difficult to  
12 obtain?

13 A. Same response.

14 Q. Records from hospitals?

15 A. Same response.

16 Q. Records from government agencies even can be  
17 difficult to obtain, correct?

18 A. Same response.

19 Q. So how was your team that you supervised on  
20 the ground in Peru able to obtain the hundreds and  
21 hundreds and hundreds of documents from such  
22 institutions that were necessary for use in the Eastern  
23 District of Missouri litigations?

24 A. Same continuing response.

25 Q. Did you ever pay anyone in a government



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1 institution to provide documents?

2 A. Same continuing response.

3 Q. That happened, didn't it?

4 A. Same continuing response.

5 Q. Or you were at least aware of payments that  
6 were made to people in government and other institutions  
7 for the provision of documents, weren't you?

8 A. Same continuing response.

9 Q. Okay. In fact, the going rate, depending on  
10 several factors --

11 MR. KUNTZ: Something you need to take? If  
12 it's a family matter, I'm happy to provide a short  
13 break.

14 (Cell phone conversation in Spanish.)

15 MR. KUNTZ: You're on the record, sir.

16 Yeah, I didn't want you to --

17 THE WITNESS: I couldn't ignore -- I couldn't  
18 ignore the call. I had to tell someone that I  
19 would call them back.

20 MR. KUNTZ: No, no, of course. I was just  
21 letting you know that you were on the record. I  
22 didn't want you to say anything private when you  
23 were on the record.

24 If you ever need to take a brief break for a  
25 family matter, I couldn't be more understanding of

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1 that.

2 THE WITNESS: Thank you.

3 BY MR. KUNTZ:

4 Q. In fact, the going rate, depending on various  
5 factors, the going rate for official records was 25 or  
6 50 soles, wasn't it?

7 A. Same continuing response.

8 Q. And you're not just handing out money to  
9 Richard Romero without some accounting, are you?

10 A. Same continuing response.

11 Q. Or Miguel Curi?

12 A. Same continuing response.

13 Q. What do you think of Miguel Curi's character?

14 A. Same continuing response.

15 Q. You don't really particularly trust Miguel  
16 Curi, do you?

17 A. Same continuing response.

18 Q. Would you put him in the same class of people  
19 as Mr. Romero?

20 A. Same response.

21 Q. Okay. So you weren't giving money to Curi or  
22 Romero or really to anyone in the ground team without  
23 some sort of accounting, correct?

24 A. Same continuing response.

25 Q. If you were going to pay 25 soles per record,

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1 you were going to get some sort of accounting of how  
2 many records you were paying for, didn't you?

3 A. Same continuing response.

4 Q. Okay. But despite all of these efforts and  
5 all of these people and payments, sometimes your ground  
6 team wasn't able to obtain the records that you wanted  
7 them to obtain at all, were they?

8 A. Same continuing response.

9 Q. And so sometimes, and Mr. Romero swore to  
10 this, sometimes when you found that process of obtaining  
11 the information too burdensome or you couldn't get the  
12 necessary signatures, you falsified the documents,  
13 didn't you?

14 A. Same continuing response.

15 Q. Mr. Curi falsified? Mr. Romero falsified?

16 A. Same continuing response.

17 Q. Other members of the ground team did?

18 A. Same response.

19 Q. One of the techniques you used to falsify  
20 documents involved a glass table and a flashlight,  
21 didn't it?

22 A. Same response.

23 Q. The folks on the ground team would get a  
24 legitimate document with a legitimate signature, and  
25 they would put that on the glass table, and then they

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1 would put the one they wanted to falsify on top of it,  
2 shine the flashlight up through the false table, and use  
3 that to forge whatever signature they needed, didn't  
4 they?

5 A. Same continuing response.

6 Q. Did you come up with that technique?

7 A. Same continuing response.

8 Q. Or was that a technique that was developed by  
9 someone on the ground team?

10 A. Same continuing response.

11 Q. Did you help to buy batteries for the  
12 flashlights?

13 A. Same response.

14 Q. But you were aware of the activity?

15 A. Same continuing response.

16 Q. Okay. It's described, in fact, in the  
17 formalization, right?

18 A. Same continuing response.

19 Q. And you've not read the formalization, haven't  
20 you?

21 A. Same response.

22 Q. Okay. When Romero came to you and said,  
23 Victor, I just can't get the thing you want me to get.  
24 You would tell him, Find a solution, wouldn't you?

25 A. Same continuing response.

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1 Q. And you knew that finding a solution often  
2 involved the sort of fraudulent activity that's  
3 described in the formalization, didn't you?

4 A. Same response.

5 Q. In fact, you told Mr. Romero in these words,  
6 albeit in Spanish, Do what you have to do, didn't you?

7 A. Same continuing response.

8 Q. I mean, Mr. Romero has -- contrary to what is  
9 happening here today, Mr. Romero has taken an oath on a  
10 piece of paper and he swore that you told him to do what  
11 you have to do?

12 A. Same continuing response.

13 Q. He swore that you told him, Find a solution?

14 A. Same continuing response.

15 Q. He swore that he made up, forged, falsified  
16 documents when he couldn't get the documents you wanted,  
17 hasn't he?

18 A. Same continuing response.

19 Q. Is Mr. Romero telling the truth?

20 A. Same continuing response.

21 Q. Okay. The forgery -- let's just take one  
22 example. The flashlight glass table forgery that I just  
23 described a second ago, that didn't happen just once or  
24 twice, did it?

25 A. Same continuing response.

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1 Q. It happened hundreds of times, didn't it?

2 A. Same response, sir.

3 Q. Okay. And during the time that that was  
4 happening, you were the boss of the Peruvian ground  
5 team, weren't you?

6 A. Same continuing response.

7 Q. And your boss was Frank Rodriguez, wasn't it?

8 A. Same continuing response.

9 Q. Except when it was Louis Thaler?

10 A. Same continuing response.

11 Q. Except when you were working with Mr. Halpren?

12 A. Same continuing response.

13 Q. Got it.

14 You know what a plaintiff profile sheet is,  
15 don't you?

16 A. Same continuing response.

17 Q. And you know the purpose it serves in this  
18 litigation?

19 A. Same response.

20 Q. Okay. You know how plaintiff profile sheets  
21 are prepared, correct?

22 A. Same response.

23 Q. Okay. It's the fact that many of the  
24 people -- strike that.

25 It's the fact that there are people living in

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1 Huancayo La Oroya and other towns in the Andean  
2 Foothills who although they speak Spanish and perhaps  
3 other languages are illiterate in that language, isn't  
4 it?

5 A. Same response.

6 Q. So you had to come up with a system for how to  
7 ensure the production and provision of plaintiff profile  
8 sheets from people who weren't able to read and write,  
9 didn't you?

10 A. Same continuing response.

11 MR. KUNTZ: Let's have Exhibit 16.

12 BY MR. KUNTZ:

13 Q. You know, we're been talking about  
14 Mr. Romero's affidavit --

15 MS. NICHOLSON: Here is 16.

16 MS. KUNTZ: Here is Exhibit 16.

17 (Thereupon, Affidavit of Richard Romero was  
18 marked as Exhibit Number 16 for identification.)

19 BY MR. KUNTZ:

20 Q. All right. So before you, sir, is  
21 Mr. Romero's affidavit, Exhibit 16. And I will note  
22 that it is originally in the Spanish language and it is  
23 translated into English, and that the English  
24 translation runs to -- hold on, more than 22 pages, that  
25 is a very large document. I want you to have as much

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1 time as you need to look at that document before I start  
2 to ask you questions about it.

3 A. Go ahead.

4 Q. You don't need to look at it anymore?

5 A. I don't need to look at it.

6 Q. Okay. Have you seen Mr. Romero's affidavit  
7 before?

8 A. I refer to my statement at the beginning of  
9 this deposition.

10 Q. Well, I mean, Mr. Romero's affidavit has been  
11 made part of the record in the Eastern District  
12 litigation, hasn't it?

13 A. The same response, sir.

14 Q. And, in fact, I believe my colleague, Angela  
15 Mecias -- Angelica Mecias, who is on the phone, will  
16 tell me if I'm wrong, but I believe that Mr. Romero's  
17 affidavit was an exhibit to the petition for 1782  
18 discovery in this very cause, wasn't it?

19 A. Same response, sir.

20 Q. And you reviewed the petition for 1782  
21 discovery in detail, haven't you?

22 A. Same response, sir.

23 Q. So today is hardly the first day that you're  
24 hearing Mr. Romero's sworn testimony regarding your and  
25 his and others activity in Peru, correct?



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1 A. Same response, sir.

2 Q. So Mr. Romero swears that between 2011 and  
3 2016, the ground team frequently altered information on  
4 the plaintiff profile sheets. That happened, didn't it?

5 A. Same response, sir.

6 Q. And that they occasionally forged the  
7 signatures on those sheets to speed up the information  
8 collection efforts. That happened, didn't it?

9 A. Same response, sir.

10 Q. And you were aware that it was happening while  
11 it was happening?

12 A. Same response.

13 Q. Okay. And on the occasions when they filled  
14 out parts of the plaintiff profile sheet from  
15 information they got from "Vaso de Leche," sometimes  
16 they would just make up information they couldn't  
17 otherwise obtain, didn't they?

18 A. Same response, sir.

19 Q. And you knew that was happening?

20 A. Same response.

21 Q. And one of the features of the plaintiff  
22 profile sheet, and we're going to look at one here in a  
23 little while, is that they contain lists of medical  
24 conditions that the plaintiffs claim to be suffering  
25 from. That's correct, isn't it?

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1 A. Same response, sir.

2 Q. And so usually if -- well, when they  
3 couldn't -- when the ground team couldn't get that  
4 information directly from the plaintiffs, whose profile  
5 sheets these were, they just made it up, didn't they?

6 A. Same response, sir.

7 Q. Okay. Importantly, the interviewers in the  
8 ground team who were speaking to these plaintiffs and  
9 potential plaintiffs, they always used pencil when they  
10 filled out their notes, didn't they?

11 A. Same response, sir.

12 Q. And the reason they used pencil, so that they  
13 could correct or amend what the plaintiff had told them  
14 at a later time, didn't they?

15 A. Same response, sir.

16 Q. Did you pay for the pencils?

17 A. Same response.

18 Q. Okay. Well, you sent Mr. Romero \$56,000 and  
19 change, correct? We've established that.

20 A. Is there a question?

21 Q. Correct, we've established that you sent  
22 Romero \$56,000 and change?

23 A. Same response, Madam Court Reporter.

24 Q. Okay. Was some of the money that you sent to  
25 Romero that \$56,000 and change that was -- some of that

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1 money was designed to support these efforts, wasn't it?

2 A. Same response.

3 Q. Plaintiff profile sheets are signed under  
4 oath, aren't they?

5 A. Same continuing response.

6 Q. Were the people -- the people who -- the  
7 plaintiffs who were providing the information for the  
8 plaintiff profile sheets, were they provided an English  
9 language -- were they provided translations of the  
10 English language sheets?

11 A. Same continuing response.

12 Q. They weren't, were they?

13 A. Same response.

14 Q. And not that many of these people down there  
15 actually read and write the English language, do they?

16 A. Same response.

17 Q. In fact, you told Romero that it was up to him  
18 to convince people to sign the English documents even  
19 when they didn't understand that, didn't you?

20 A. Same response, sir.

21 Q. Okay. Let's talk about notaries.

22 So the plaintiff profile sheets were  
23 notarized, weren't they?

24 A. Same response, sir.

25 Q. And we've talked before about how notaries in

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1 Peru are kind of a bigger deal than they are here in the  
2 United States, and that's true, isn't it?

3 A. Same response, sir.

4 Q. Okay. You are familiar, aren't you, with all  
5 of the requirements for properly notarizing a document  
6 under the Peruvian system, aren't you?

7 A. Same response.

8 Q. Okay. Would you tell me, please, the names of  
9 every notary you can recall in Peru whoever notified  
10 [sic] a plaintiff profile sheet?

11 A. Same continuing response.

12 Q. Okay. Ivan Coral Flores was such a notary,  
13 wasn't he?

14 A. Same continuing response.

15 Q. And you met with Mr. Coral, didn't you?

16 A. Same continuing response.

17 Q. All right. Well, let's take a look at  
18 Exhibit 17.

19 MR. KUNTZ: That's your cue. You should be  
20 keyed in on the word "exhibit."

21 (Thereupon, Fernando Arturo Nunez Rojas' Sworn  
22 Statement was marked as Exhibit Number 17 for  
23 identification.)

24 MR. FERNANDEZ: Thank you.

25 MR. KUNTZ: Just let me know when you are

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1 ready.

2 THE WITNESS: Just give me a sec.

3 MR. KUNTZ: No worries.

4 Ready?

5 THE WITNESS: Almost.

6 Okay.

7 BY MR. KUNTZ:

8 Q. So Exhibit 17, we're getting used to this now,  
9 in the back is the Spanish language original, in the  
10 front is the English language translation. Tell me when  
11 you're ready to answer questions about it.

12 You know who Fernando Arturo Nunez Rojas is,  
13 don't you?

14 A. Same response.

15 Q. You know that Mr. Rojas was an employee of  
16 Ivan Martin Coral Flores, correct?

17 A. Same continuing response.

18 Q. He worked in the notary public office in  
19 Tarma, Peru from 2013 to 2016, didn't he?

20 A. Same continuing response.

21 Q. Tarma is sort of the bigger town in the  
22 vicinity of Huancayo and La Oroya, isn't it?

23 A. Same continuing response.

24 Q. Okay. And among Mr. Rojas' duties, he swears,  
25 were processing the legalization of signatures. You

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1 knew that, right?

2 A. Same continuing response.

3 Q. Now, Mr. Nunez' -- I keep saying Rojas, but  
4 it's Nunez. Mr. Nunez' declaration states that he saw  
5 180 documents being properly notarized by Mr. Coral.  
6 Were you aware -- you were aware that Mr. Coral was  
7 notarizing documents for use in the Eastern District  
8 litigations, weren't you?

9 A. Same continuing response.

10 Q. That was -- just so we're clear, the notary  
11 we're talking about, this is all in Peru, right?

12 A. Same continuing response.

13 Q. Right.

14 Okay. And Mr. Nunez says, though, that there  
15 were 830 signatures that were certified by Coral,  
16 doesn't he?

17 A. Same continuing response.

18 Q. But only 180 of those were properly notarized,  
19 weren't they?

20 A. Same response.

21 Q. Okay. In fact, there was an event, if you  
22 will, where there was sort of a mass signing of  
23 documents by plaintiffs and by parents of minor  
24 plaintiffs, wasn't there?

25 A. Same continuing response.

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1 Q. Mr. Nunez was present at that, wasn't he?

2 A. Same continuing response.

3 Q. Right.

4 Mr. Nunez has absolutely no reason to lie  
5 about what happened in Peru, does he?

6 A. Same continuing response.

7 Q. Mr. Nunez wasn't -- okay.

8 Let's look at another notary employee's  
9 declaration. This is going to be Number 18.

10 (Thereupon, Affidavit of Gladys Huaranga Barra  
11 was marked as Exhibit Number 18 for  
12 identification.)

13 BY MR. KUNTZ:

14 Q. Number 18, sir, is declaration of Gladys  
15 Huaranga Barra.

16 MR. KUNTZ: Middle name is -- or the  
17 patronymic name is H-U-A-R-A-N-G-A, and the  
18 matronymic is B-A-R-R-A.

19 BY MR. KUNTZ:

20 Q. Did you know Ms. Huaranga?

21 A. Same continuing response.

22 Q. Okay. She was employed, she swears, in a  
23 notary office of a fellow by the name of Augusto Balbin,  
24 B-A-L-B-I-N, Guadalupe.

25 A. Same continuing response.

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1 Q. You know of Mr. -- you knew Mr. Balbin, didn't  
2 you?

3 A. Same response.

4 Q. Okay. Mr. Balbin was a notary in -- hold  
5 on -- Mr. Balbin was a notary in Peru, wasn't he?

6 A. Same response.

7 Q. His office was in La Oroya, right?

8 A. Same response.

9 Q. Okay. So Ms. Huaranga swears that while she  
10 was employed by Balbin, the notary, she "observed  
11 certain individuals, processors, or agents who  
12 coordinated the authentication of signatures and  
13 procedures related to the registration of claimants of  
14 judicial actions against Doe Run and Renco."

15 That happened, right?

16 A. Same response.

17 Q. You were aware of the Balbin notary office  
18 being used to notarize documents for use in the Eastern  
19 District of Missouri litigations, weren't you?

20 A. Same continuing response.

21 Q. Okay. And you were aware that, as Ms.  
22 Huaranga swears under oath, that very often Mr. Balbin  
23 would violate the required notary processes, weren't  
24 you?

25 A. Same continuing response.



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1 Q. Okay. For example, he would mass- -- do  
2 massive legalizations of invalid signatures, and you  
3 knew that he did that, didn't you?

4 A. Same continuing response.

5 Q. Ms. Huaranga swears that Mr. Balbin would  
6 misuse his notary seal, and you knew that he did that,  
7 didn't you?

8 A. Same continuing response.

9 Q. Mr. Balbin received money for this work,  
10 didn't he?

11 A. Same continuing response.

12 Q. And, in fact, most of the time the documents  
13 that Balbin was legalizing came to him in bulk via  
14 Mr. Romero and Mr. Curi, didn't they?

15 A. Same response.

16 Q. They had folders of documents for him to  
17 legalize, didn't they?

18 A. Same response.

19 Q. And that was all part of the ground operation  
20 in La Oroya and Huancayo Junin and environs?

21 A. Same response.

22 Q. And that's the ground operation that you were  
23 in charge of?

24 A. Same response.

25 Q. That's some of the work that you describe in

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1 Exhibit 4, your declaration under oath, submitted in  
2 this matter on August 4th, isn't it?

3 A. Same response.

4 Q. It's exactly the work you swore that you did?

5 A. Same continuing response.

6 Q. And it's exactly the work that the  
7 formalization describes that you did in an unlawful  
8 fashion for which you are now provisionally charged with  
9 serious crimes in Peru, correct?

10 A. Same response, sir.

11 Q. Okay. Now, Mr. Balbin at a certain point fell  
12 sick, didn't he?

13 A. Same response.

14 Q. You knew that he had fallen sick, didn't he?

15 A. Same response.

16 Q. But he had a son named Oscar Balbin Solis,  
17 S-O-L-I-S, didn't he?

18 A. Same response.

19 Q. Now, Oscar was not a notary, was he?

20 A. Same response.

21 Q. And you knew that Oscar was not a notary?

22 A. Same continuing response.

23 Q. But when his father fell ill, the pace of  
24 notarization didn't slack in Balbin's because Curi and  
25 Romero, with your blessing, simply had Oscar notarize

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1 things for his ill father, didn't you --

2 A. Same continuing response.

3 Q. -- didn't he?

4 All right. Let's take a look at 19.

5 (Thereupon, Affidavit of Nady Yarasca was marked  
6 as Exhibit Number 19 for identification.)

7 BY MR. KUNTZ:

8 Q. There is no reason for Gladys Huaranaga to  
9 lie, is there?

10 A. Same response, sir.

11 Q. There's no reason for a woman named Nady  
12 Susana Yarasca Aquino, Y-A-R-A-S-C-A, there is no reason  
13 for her to lie either, is there?

14 A. Same response, sir.

15 Q. Sir, how would commenting on Ms. Yarasca's  
16 pension for veracity implicate the Peruvian  
17 Constitutional rights upon which you're basing your  
18 refusal to answer my questions today?

19 A. My continuing response.

20 Q. You don't even want to tell me how this fits  
21 your continuing response?

22 A. Same continuing response.

23 Q. Your response to my question about your answer  
24 about your continuing response is your continuing  
25 response; is that correct?

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1 A. You heard me, sir.

2 Q. I did hear you.

3 Am I correct?

4 A. Yes.

5 Q. Yeah.

6 So Ms. Yarasca's sworn statement confirms,  
7 corroborates Ms. Huaranaga's sworn statement, doesn't  
8 it? Have you looked at it? I gave it to you to look at  
9 it.

10 A. Yes, I have the document in front of me, and I  
11 continue to defer to my statement.

12 Q. Okay. So Ms. Yarasca who doesn't have a  
13 reason to lie corroborates what Ms. Huaranga --  
14 Huaranga, who doesn't have a reason to lie, says about  
15 Curi and Romero bringing folders full of documents to  
16 Oscar for notarization, doesn't she?

17 A. Same response.

18 Q. And you were aware that this was happening?

19 A. Same response, sir.

20 Q. In fact, you were supervising the efforts of  
21 all of these people, weren't you?

22 A. Same response.

23 Q. Okay. And these documents that were illegally  
24 notarized in bulk in the office of Notary Balbin, many  
25 of those documents have now been produced in -- produced

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1 in the Eastern District of Missouri litigations, haven't  
2 they?

3 A. Same response, sir.

4 Q. Interestingly enough, but it's, you know,  
5 fairly a small town, Ms. Yarasca was not only an  
6 employee of -- was not only in a position to give the  
7 information she gave in her declaration about Balbin,  
8 she was also involved in the "Vaso de Leche" program.  
9 Did you know that?

10 A. Same response, sir.

11 Q. In fact, Ms. Yarasca was a former employee of  
12 the municipal government in La Oroya, and you knew that?

13 A. Same response, sir.

14 Q. In fact, you know that she worked as a  
15 supervisor for the "Vaso de Leche" program, don't you?

16 A. Same response.

17 Q. And she was involved in Romero and Curi's,  
18 we've called it leveraging of the "Vaso de Leche"  
19 program to recruit plaintiffs, wasn't she?

20 A. Same continuing response.

21 Q. She says she was.

22 A. Same continuing response.

23 Q. And you're aware that she was?

24 A. Same continuing response.

25 Q. Okay. Is signatory has to be present in front

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1 of a notary in Peru for the notary to notarize the  
2 document, correct?

3 A. Same continuing response.

4 Q. Okay. And that notarization typically has not  
5 just a signature but a fingerprint on it, correct?

6 A. Same response.

7 Q. So you all had a problem, didn't you, that it  
8 wasn't enough to put documents on a glass table with a  
9 flashlight under it and forge the signatures. The  
10 ground operation also had to get fingerprints onto those  
11 documents, didn't it?

12 A. Same continuing response, Madam Court  
13 Reporter.

14 Q. And given that the signatories whose  
15 signatures were being forged weren't there, you had to  
16 come up with a solution, didn't you?

17 A. Same continuing response.

18 Q. And Mr. Romero came up with a solution, didn't  
19 he?

20 A. Same continuing response.

21 Q. That solution was for members of the ground  
22 team to simply affix their own fingerprints to the  
23 documents that were being falsely officialized, wasn't  
24 it?

25 A. Same response.

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1 Q. And you were aware of Mr. Romero's efficient  
2 plan for getting these things fingerprinted, weren't  
3 you?

4 A. Same response.

5 Q. You didn't do anything in Peru on behalf of  
6 the -- of the American lawyers without telling the  
7 American lawyers what you were doing, did you?

8 A. Same response.

9 Q. Mr. Rodriguez did you a service -- well,  
10 strike that.

11 Let's start with Mr. Thaler. Mr. Thaler did  
12 you a service by giving you employment after you lost  
13 your license to practice law, didn't he?

14 A. Same continuing response.

15 Q. His beneficence allowed you to continue  
16 working in the legal field, albeit not as a lawyer,  
17 didn't it?

18 A. Same continuing response.

19 Q. And then Mr. Rodriguez, when Mr. Thaler moved  
20 on from employing you, Mr. Rodriguez employed or 1099'd  
21 you and gave you similar work again in the legal field,  
22 despite having been disbarred, didn't he?

23 A. Same continuing response.

24 Q. Not everybody would hire a disbarred lawyer to  
25 work in their law office, would they?

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1 A. Same continue -- same continuing response.

2 Q. Yeah.

3 So you sort of owed Mr. Thaler and  
4 Mr. Rodriguez a debt of some gratitude for employing you  
5 despite your ignominious conclusion to your legal  
6 career?

7 A. Same response, sir.

8 Q. So is your refusal to answer here in aid of  
9 that gratitude to Mr. Rodriguez or Mr. Thaler or some  
10 other lawyer?

11 A. You can refer to my statement, sir.

12 Q. Okay. And do you have any regrets at all  
13 about the fact that your activities in Peru as set forth  
14 in your own declaration and in the formalization, and as  
15 further elucidated here may have cause or caused trouble  
16 for those lawyers who did you that service?

17 MR. RODRIGUEZ: I'm going to object to the  
18 form. That's -- you've said -- that's outrageous  
19 that you say that, but I object to the form.

20 Go ahead.

21 MR. KUNTZ: Mr. Rodriguez, see, I appreciate  
22 that it was only a form objection. I'm going to  
23 move to strike it because you're not here as  
24 Mr. Careaga's lawyer, you're not entitled to  
25 objections to form other than to impose work



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1 product objections, but I appreciate that it was  
2 just form of the question, and now it's on the  
3 record.

4 BY MR. KUNTZ:

5 Q. You have my question, sir. Would you answer?

6 A. It was an outrageous question, and I'll refer  
7 to my statement.

8 MR. HALPREN: I will join in the objection to  
9 form.

10 MR. KUNTZ: And I would make the same note  
11 that that's outside the scope what your admission  
12 permits, Jay, but again appreciate -- Mr. Halpren,  
13 I apologize, but appreciate that it was only for  
14 form.

15 BY MR. KUNTZ:

16 Q. How many plaintiff profile sheets bearing  
17 false notary stamps from Mr. Balbin's office were  
18 produced in the Missouri litigations?

19 A. Same continuing response.

20 Q. How many from all sources of false  
21 notarization?

22 A. Same continuing response.

23 Q. Lots and lots, though, wasn't it?

24 A. Same continuing response.

25 Q. All right. 20.

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1 Have you ever had a --

2 MR. KUNTZ: And let me have 21 as well. We  
3 will put them both on the table at once. Just make  
4 life a little more efficient.

5 (Thereupon, Sunarp, Estudio Victor A Careaga Y  
6 Asociados was marked as Exhibit Number 20 for  
7 identification.)

8 (Thereupon, Consulta RUC was marked as Exhibit  
9 Number 21 for identification.)

10 BY MR. KUNTZ:

11 Q. So I'm going to show you 20 and 21, give the  
12 reporter a chance to mark them.

13 MS. NICHOLOS: This is 20.

14 MR. KUNTZ: That one is 20.

15 MS. NICHOLOS: 21.

16 MR. KUNTZ: 21.

17 MS. NICHOLOS: This is 20.

18 THE COURT REPORTER: I'm going to go --

19 MR. KUNTZ: Yeah, that's fine. Whatever you  
20 got to do.

21 MS. NICHOLOS: And 21.

22 MR. RODRIGUEZ: 20?

23 MR. KUNTZ: 20 is the one with more advanced  
24 type on it.

25 MS. NICHOLOS: And 21.

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1 MR. RODRIGUEZ: Thank you.

2 MR. KUNTZ: Let me do these exhibits. I've  
3 just realized we've gone past an hour. We will do  
4 these exhibits, and we'll take a break and we'll  
5 come back.

6 And, Mr. Careaga, I am confident but not  
7 certain that we'll be done before 4:30. You had  
8 said that you had to leave at 4:30.

9 BY MR. KUNTZ:

10 Q. Okay. Take a look at Exhibits 20 and 21,  
11 please.

12 For a time you maintained law office in Peru,  
13 didn't you?

14 A. I'll refer to my statement at the outset of  
15 this deposition.

16 Q. And the name of that law firm in Peru as  
17 "Estudio Victor Careaga Y Asociados" -- yeah,  
18 "asociados."

19 I think I did that right, but that was the  
20 name of your law firm in Peru, wasn't it?

21 A. Same continuing response.

22 Q. Okay. And then after just a couple of  
23 years -- well, the firm was opened in 2012, correct?

24 A. Same continuing response.

25 Q. And then you closed the firm in 2014, correct?

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1 A. Same continuing response.

2 Q. As a lawyer in Per- -- as someone with a law  
3 office in Peru, were you obligated to pass any exams?

4 A. Same continuing response.

5 Q. Were you obligated to take any oath?

6 A. Same continuing response.

7 Q. Were there any standards or rules governing  
8 your practice?

9 A. Same continuing response.

10 Q. The behavior described in the formalization --  
11 your criminal behavior described in the formalization  
12 all would violate the standards and practices for  
13 someone with a Peruvian law practice, wouldn't they?

14 A. Same continuing response.

15 MR. KUNTZ: All right. This looks like a good  
16 place for a break, and then we'll come back.

17 THE VIDEOGRAPHER: Off record 1:58 p.m.

18 (There was a discussion off of the record.)

19 THE VIDEOGRAPHER: On record 2:17 p.m.

20 BY MR. KUNTZ:

21 Q. Mr. Careaga, you heard Mr. Rodriguez say in  
22 the context of an objection he made that you are, I  
23 think he said "are," a 1099 employee. You didn't  
24 produce any documentation with regard to your 1099  
25 employment in response to the subpoena, did you?

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1 A. Same continuing response.

2 Q. But you would have that to produce if -- if  
3 I -- if you wanted to, correct?

4 A. Same continuing response.

5 Q. All right. You know somebody named Cecilia  
6 Lujan, L-U-J-A-N, don't you?

7 A. Same continuing response.

8 Q. Okay. She also gave a declaration, and she  
9 also has no reason to lie, does she?

10 A. Same continuing response.

11 MR. KUNTZ: And I want Exhibit 22.

12 MS. NICHOLOS: Sorry.

13 MR. KUNTZ: That's okay.

14 (Thereupon, Affidavit of Cecilia Saby Lujan  
15 Limas was marked as Exhibit Number 22 for  
16 identification.)

17 MR. RODRIGUEZ: Let me -- for the record,  
18 objection to form with regard to that last  
19 question. I don't think this witness would have  
20 any way of knowing the mental state of the affiant.

21 MR. KUNTZ: Frank, on what part of the court's  
22 order with regard to your limited intervention -- I  
23 apologize.

24 Mr. Rodriguez, with regard to what part of  
25 court's order authorizing your limited intervention

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1 here do you impose an objection to form as to  
2 calling for speculation on a mental state? How  
3 does that implicate work product?

4 MR. RODRIGUEZ: I just think it's an -- it  
5 mischaracterizes -- mischaracterizes the evidence.

6 MR. KUNTZ: My question is a little bit  
7 different than that.

8 You've been permitted to intervene, the firm  
9 has been permitted to intervene. I don't mean to  
10 personalize it. You've been permitted to intervene  
11 in this matter for purposes of asserting work  
12 product doctrine objections.

13 MR. RODRIGUEZ: I'm not sure that is the only  
14 reason, though, but that is certainly my primary  
15 reason, that I'm here to assert work product  
16 protection on behalf of my clients.

17 MR. KUNTZ: Okay. I submit that you're not  
18 permitted to object to the form of the question as  
19 it calls for speculation, as that objection is  
20 designed to protect the deponent whom you don't  
21 represent here today.

22 MR. RODRIGUEZ: I don't represent the  
23 deponent. I think that is very clear.

24 MR. KUNTZ: Okay.

25 MR. RODRIGUEZ: We stated our peace for the

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1 record.

2 BY MR. KUNTZ:

3 Q. Okay. All right.

4 You have Exhibit 22 in front of you, sir?

5 That's the affidavit of Cecilia Saby Lujan

6 Limas. And does she have any reason to lie, sir?

7 MR. RODRIGUEZ: Object to the form.

8 THE WITNESS: Same continuing response.

9 BY MR. KUNTZ:

10 Q. Okay. Ms. Lujan says under oath -- why don't  
11 you take a look at paragraph 9 of her declaration.

12 She says that "The work team for the  
13 census" -- which I'm trying to skip a few things, she  
14 describes what that means earlier in the declaration.

15 She says, "The work team for the census was  
16 led mainly by two two U.S. lawyers, Victor Careaga and  
17 Francisco 'Frank' Rodriguez."

18 Do you see where she says that?

19 A. Same continuing response.

20 Q. And that's true, isn't it?

21 A. Same response.

22 MR. RODRIGUEZ: Excuse me, what paragraph 9?

23 MR. KUNTZ: Paragraph 9.

24 MR. RODRIGUEZ: Thank you.

25 MR. KUNTZ: Page 2.

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1 MR. RODRIGUEZ: Thank you.

2 BY MR. KUNTZ:

3 Q. She says that in about "mid 2014 Victor  
4 Careaga and Francisco 'Frank' Rodriguez came to Huancayo  
5 to coordinate and facilitate the recruitment work for  
6 the lawsuit against Doe Run."

7 You see where she says that?

8 A. Same continuing response.

9 Q. And that's true, isn't it?

10 A. Same response, sir.

11 Q. You and Mr. Rodriguez traveled to Huancayo in  
12 mid 2014 for that purpose, right?

13 A. Same response.

14 Q. And then she says that "Between" -- this is  
15 now paragraph 11.

16 "Between 2016 and 2017, Victor Careaga and  
17 Francisco 'Frank' Rodriguez traveled to La Oroya to  
18 participate in mass meetings with plaintiffs and their  
19 family members."

20 You see where it says that?

21 A. Same response, sir.

22 Q. And that's true, isn't it?

23 A. Same response.

24 Q. In fact, we saw video of one such mass  
25 meeting, didn't we?



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1 A. Same continuing response.

2 Q. That was from June 2016, exactly the period  
3 she speaks of here, isn't it?

4 A. Same continuing response.

5 Q. Right.

6 And on at least one of those occasions she  
7 swears, "Victor Careaga and Francisco 'Frank' Rodriguez  
8 were also accompanied by an attorney, Hunter Shkolnik."

9 You see where it says that, yes?

10 A. Same continuing response.

11 Q. And, in fact, that is true, isn't it?

12 A. Same response, sir.

13 Q. Because that's precisely the video that we  
14 just saw as Exhibit 12, if I'm not mistaken, where there  
15 is you, Mr. Rodriguez, and Mr. Shkolnik at one of these  
16 mass meetings, correct?

17 A. Same response, sir.

18 Q. Okay. So she swears that during the meetings  
19 with the plaintiffs, you interacted with plaintiffs  
20 directly.

21 Let's just start there. You see where she  
22 says that?

23 A. Same response, sir.

24 Q. And you did interact with plaintiffs directly,  
25 didn't you?

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1 A. Same response.

2 Q. All right. She says that you particularly did  
3 that "particularly to translate information between them  
4 and for Frank Rodriguez."

5 Do you see where it says that?

6 A. Same continuing response.

7 Q. And she is stating the truth, isn't she?

8 A. Same continuing response.

9 Q. Because we saw you in a video with  
10 Mr. Rodriguez. At that time you were translating for  
11 Mr. Shkolnik, but you were certainly translating,  
12 weren't you?

13 A. Same continuing response, sir.

14 Q. Right.

15 And she then states, going on in paragraph 12,  
16 that "Victor Careaga was responsible for translating  
17 large portions of the mass meetings that took place  
18 between 2016 and 2017."

19 You see where it says that?

20 A. Same continuing response.

21 Q. But do you see where it says that?

22 A. I saw it already.

23 Q. And it's the truth, isn't it?

24 A. Same continuing response.

25 Q. And you weren't a lawyer anymore in 2016 or

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1 2017, were you?

2 A. Same continuing response.

3 Q. You were a disbarred lawyer operating under  
4 the strictures of the Florida Bar rules that govern the  
5 behavior of disbarred lawyers working in law offices,  
6 weren't you?

7 A. Same continuing response, sir.

8 Q. Okay. Now, Ms. Lujan also says in  
9 paragraph 13 that "During the meetings with the  
10 plaintiffs, many people asked for documents they had  
11 signed for the lawsuit to be returned to them, as they  
12 disagreed with the proportion of money that U.S.  
13 attorneys would be earning if the lawsuit was  
14 successful."

15 Do you see where it says that, right, in  
16 paragraph 13?

17 A. Same response, sir.

18 Q. And when she said that that's true, that's  
19 what happened, right?

20 A. Same response.

21 Q. People wanted their documents back because  
22 they weren't happy with the contingency split when they  
23 learned about it, correct?

24 A. Same response, sir.

25 Q. Okay. And she swears that Frank Rodriguez

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1 spoke with some of the people, and that you helped to  
2 translate. That's true, isn't it?

3 A. Same response, sir.

4 Q. Because, as we've said, although Mr. Rodriguez  
5 has way better Spanish than I do, he doesn't have your  
6 fluency, does he?

7 A. Same continuing response, Madam Court  
8 Reporter.

9 Q. Okay. Among those that you met with  
10 Mr. Rodriguez during this period were many prospective  
11 clients, correct?

12 A. Same continuing response.

13 Q. Okay. And the reason for your meetings with  
14 prospective clients was to enlist them as clients,  
15 correct?

16 A. Same continuing response.

17 Q. Likewise, that was Mr. Rodriguez' intention as  
18 best you know, correct?

19 A. Same continuing response.

20 Q. Do you know that Ms. Lujan is still being  
21 listed as a team member on the Hunter Shkolnik web page?

22 MR. KUNTZ: 23.

23 THE WITNESS: Same continuing response.

24 BY MR. KUNTZ:

25 Q. Did you ever look at the Hunter Shkolnik web

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1 page?

2 A. Same continuing response.

3 Q. So this is a printout of the Hunter Shkolnik  
4 web page that I want to say -- this is Exhibit 23.

5 (Thereupon, Hunter Shkolnik web page was marked  
6 as Exhibit Number 23 for identification.)

7 MR. KUNTZ: Let me let the reporter mark it.

8 MR. RODRIGUEZ: Did I miss 22?

9 MR. KUNTZ: Cecilia Lujan's affidavit.  
10 Did I not put it in?

11 MS. NICHOLOS: No, we did.

12 THE COURT REPORTER: I have it.

13 MR. RODRIGUEZ: Did you give me a copy and I  
14 just -- oh, no.

15 I'm sorry. Never mind. I got it.

16 MR. KUNTZ: They all look the same, it gets  
17 stacked up.

18 MR. RODRIGUEZ: I got it.

19 MR. KUNTZ: Marked?

20 Okay.

21 BY MR. KUNTZ:

22 Q. So now you have in front of you Exhibit 23  
23 which is a printout from the Hunter Shkolnik web page.  
24 Now, you'll notice that there is a date on top of that,  
25 February 15, 2023, that is when we printed it out the

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1 first time in anticipation of this deposition.

2 Do you ever look at the Hunter Shkolnik web  
3 page?

4 A. Same continuing response.

5 Q. Okay. I can tell you that when we looked at  
6 it last night, didn't print out a new one, but just take  
7 a look on page 2, second line from the bottom, all the  
8 way to the right, we see Cecilia G. Lujan's name listed  
9 as team member.

10 Do you see that?

11 A. Same continuing response.

12 Q. Do you know if Cecilia Lujan intends to be --  
13 do you know if Cecilia Lujan is willingly listed as a  
14 team member on the Hunter Shkolnik web page?

15 A. Same continuing response.

16 Q. And the Hunter Shkolnik web page it may be,  
17 but this states that it is "The Napoli Shkolnik and  
18 Rodriguez Tramont & Nunez law firms who continue to have  
19 an office and representatives in La Oroya," right?

20 So she's listed as a team member in that  
21 office. Are you aware of that?

22 A. Same response, sir.

23 Q. Did you ever visit the Rodriguez Tramont law  
24 firm office in La Oroya?

25 A. Same response.

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1 Q. Is there a Rodriguez Tramont office in  
2 La Oroya?

3 A. Same response.

4 Q. How about Hunter Shkolnik, does Hunter  
5 Shkolnik maintain an office in La Oroya?

6 A. Same response.

7 Q. Okay. Let's take a look at the declaration of  
8 Lucy Rojas.

9 (Thereupon, Sworn Declaration of Lucy Esther  
10 Rojas Argandoña was marked as Exhibit Number 24  
11 for identification.)

12 BY MR. KUNTZ:

13 Q. Sir, before you we've marked Exhibit 24 to  
14 this deposition. It is the sworn declaration of Lucy  
15 Esther Rojas Argandoña, A-R-G-A-N-D-O-Ñ-A.

16 You know Lucy Rojas, don't you?

17 A. Same response, sir.

18 Q. And Lucy Rojas doesn't have any reason to lie,  
19 does she?

20 A. Same response.

21 Q. Ms. Rojas swears that in March of 2016, when  
22 you were running "los tramitadores de plomo," that four  
23 women came to her home in Santa Rosa de Sacco,  
24 S-A-C-C-O, and offered to donate notebooks and school  
25 supplies for her children if she signed some documents.

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1 You were aware of that, weren't you?

2 A. Same response, Madam Court Reporter.

3 Q. Okay. And you knew that Lucy Rojas was told  
4 that to receive these school supplies, she'd have to go  
5 to a private home to pick them up, correct?

6 A. Same response.

7 Q. It wasn't the practice of your ground team to  
8 show up at a prospective client's house with school  
9 supplies, was it?

10 A. Same response.

11 Q. Wasn't their practice to show up at the house  
12 with food aid, was it?

13 A. Same response.

14 Q. Rather to obtain these gifts, the prospective  
15 client would have to go somewhere and do some things,  
16 wouldn't they?

17 A. Same response.

18 Q. And in this case, what the client -- the  
19 prospective client was told that she needed to do was to  
20 take her children to a home to receive the school  
21 supplies, wasn't she?

22 A. Same response.

23 Q. But you know that when she got there, she was  
24 told what had to happen first, was that her children had  
25 to be tested for blood lead levels, correct?



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1 A. Same response.

2 Q. Blood lead levels, which is a tongue twister,  
3 are awfully significant in the Eastern District of  
4 Missouri litigations, aren't they?

5 A. Same response, sir.

6 Q. Those lawsuits are predicated on the notion  
7 that exposure to lead has caused injury to people in the  
8 Andean Foothill around La Oroya, Huancayo, and environs,  
9 isn't it?

10 A. Same response, sir.

11 Q. In fact -- in fact, it is the foundational  
12 principal of the lawsuits in the Eastern District of  
13 Missouri in which you were one of the earliest lawyer  
14 participants that the Doe Run Resources Corporation and  
15 the Renco Group, Inc. are responsible for injuries to  
16 people in the Andean Foothills based on the operations  
17 of mining and refining activities under their  
18 supervision in that area, right?

19 A. Same continuing response.

20 Q. In fact, they're solely responsible under  
21 those lawsuits, right?

22 A. Same continuing response.

23 Q. Do you believe that people are responsible for  
24 their actions?

25 A. Same continuing response.

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1 Q. Do you believe that you are responsible for  
2 your actions?

3 A. Same continuing response.

4 Q. How about Mr. Rodriguez, is he responsible for  
5 his actions?

6 A. The same response, sir.

7 Q. Mr. Halpren?

8 A. Same response.

9 Q. The other lawyers in the case?

10 A. Same response.

11 Q. Okay. Ms. Rojas swears that her children  
12 became enrolled in the Eastern District of Missouri  
13 litigation without her consent. That's true, isn't it?

14 A. Same response, sir.

15 Q. In fact, given the way the ground team  
16 operated, there are a lot of people, plaintiffs present  
17 and past, who are enrolled in those litigations without  
18 their consent, aren't they?

19 A. Same response, sir.

20 Q. Indeed many of the plaintiffs present and past  
21 don't even know that they are plaintiffs, do they?

22 A. Same continuing response.

23 Q. You've been told that by members of the ground  
24 team, haven't you?

25 A. Same continuing response.

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1 Q. And you've read the formalization which  
2 describes that as well?

3 A. Same continuing response.

4 Q. Let's take a look at another declaration, this  
5 is Exhibit Number 25.

6 (Thereupon, Sandra Maritza Hinostroza Perez'  
7 sworn statement was marked as Exhibit Number 25  
8 for identification.)

9 MR. KUNTZ: Let me see who is texting me with  
10 such determination.

11 BY MR. KUNTZ:

12 Q. Okay. Exhibit Number 25 before you is now,  
13 sir, is the declaration of Sandra Maritza Hinostroza  
14 Perez, middle name H-I-N-O- -- well, again, patronymic,  
15 H-I-N-O-S-T-R-O-Z-A.

16 You know who Sandra Hinostroza is, don't you?

17 A. Same response, sir.

18 Q. Am I even close on that pronunciation?

19 MR. RODRIGUEZ: Yes.

20 MR. KUNTZ: Thanks.

21 BY MR. KUNTZ:

22 Q. You know who Sandra Hinostroza is?

23 A. Same response, sir.

24 Q. And she doesn't have any reason to lie, does  
25 she?

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1 A. Same response.

2 MR. RODRIGUEZ: Object to the form.

3 BY MR. KUNTZ:

4 Q. She says -- she swears that she never signed  
5 anything authorizing attorneys in the United States to  
6 represent her children for the purposes of suing Doe  
7 Run.

8 Is that the truth?

9 A. Same response.

10 Q. She says that "In January of 2013, Richard  
11 Romero was well known at that time as a recruiter of the  
12 plaintiffs in the lawsuits in Missouri."

13 That's true, isn't it?

14 A. Same continuing response.

15 Q. You employed him some years before to begin  
16 that process, hadn't you?

17 A. Same continuing response.

18 Q. And she says that a woman accompanied  
19 Mr. Romero to her place of residence in Pueblo Joven San  
20 Vicente de Paul. Mr. Romero went there with a woman,  
21 didn't he?

22 A. Same response.

23 Q. And offered school supplies to Ms. Hinostroza,  
24 didn't she --

25 A. Same response.

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1 Q. -- he?

2 Sorry.

3 She wasn't home, so her sister dealt with him,  
4 correct?

5 A. Same response.

6 Q. Right. And about a week after that visit,  
7 Romero and the woman who accompanied him took her  
8 children to Plaza Libertad in La Oroya Antigua to claim  
9 the school supplies, correct?

10 A. Same response, sir.

11 Q. I mean, she doesn't have any reason to lie  
12 about this happening, does she?

13 A. Same continuing response.

14 Q. Because she signed an oath saying this is what  
15 happened?

16 A. Same continuing response.

17 Q. Just like the oath you signed --

18 A. Same response, sir.

19 Q. Just like the oath you signed for the  
20 August 4th submission of your declaration that you said  
21 was signed that -- that you said reflects your, I think,  
22 respect for the Southern District of Florida. So this  
23 oath -- her oath is just like that, isn't it?

24 A. Same response, sir.

25 Q. She says that the children were blood tested

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1 without her consent. That's true, isn't it?

2 A. Same response.

3 Q. You were present at numerous times when  
4 children and adults were blood tested in Peru, weren't  
5 you?

6 A. Same response.

7 Q. Some of those blood tests took place in  
8 medical labs, didn't they?

9 A. Same response.

10 Q. But a lot of them didn't take place in any  
11 medical lab, did they?

12 A. Same response.

13 Q. And a lot of those blood tests were not  
14 conducted by medical professionals, were they?

15 A. Same response.

16 Q. Were you at all concerned when you were  
17 supervising the ground team in La Oroya, Huancayo, and  
18 environs that any children might be injured by these  
19 nonmedical professionals who were engaging in medical  
20 procedures on them?

21 A. Same continuing response.

22 MR. RODRIGUEZ: Let me object to the form.

23 You're testifying.

24 MR. KUNTZ: So again, just for the record,  
25 that's not a work product objection, it's improper.

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1 Move to strike it.

2 THE WITNESS: He has testified all day, so...

3 MR. RODRIGUEZ: You know, when I said there  
4 was no testifying, I said the witness hadn't  
5 testified. You've been testifying all day, it's up  
6 to you.

7 MR. KUNTZ: Anything else?

8 THE WITNESS: Nope.

9 BY MR. KUNTZ:

10 Q. Let's take a look at --

11 MR. RODRIGUEZ: By the way, I want to respond  
12 to that with regard to work product. Whatever  
13 procedures are in place to -- to do the lead blood  
14 testing, that certainly would, in my estimation,  
15 would be work product.

16 And you're mischaracterizing by your question  
17 that nonmedical professionals were involved in the  
18 process. There is no evidence of that, and, in  
19 fact, that did not happen.

20 MR. KUNTZ: So if a blood test were performed  
21 in someone's house, the nature of that blood  
22 testing is, in your view, a work product privilege?

23 MR. RODRIGUEZ: The -- how the plaintiffs  
24 conduct things like blood testing, unless there is  
25 some kind of, you know, crime for unexception, then

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1 I don't see how you're entitled to that  
2 information.

3 MR. KUNTZ: Okay.

4 BY MR. KUNTZ:

5 Q. Let's take a look at Exhibit 26.

6 (Thereupon, Dayeli Nicole Zavala Hinostroza's  
7 sworn statement was marked as Exhibit Number 26  
8 for identification.)

9 MR. KUNTZ: And for everyone's scheduling  
10 purposes, we're moving right along here.

11 Wait -- yeah, yeah, that's right.

12 Got it. Yeah, yeah.

13 BY MR. KUNTZ:

14 Q. Sir, before you is Exhibit 26, the declaration  
15 Dayeli, D-A-Y-E-L-I, Nicole Zavala, with a Victor --  
16 with a V, like Victor Hinostroza's sworn statement?

17 MR. RODRIGUEZ: Excuse me, Robert.

18 Was Sandra Maritza Hinostroza Number 25? I  
19 just want to confirm.

20 MR. KUNTZ: Yeah, I believe that is correct.

21 Hold on, Frank, before I -- before I lead you  
22 astray --

23 MR. RODRIGUEZ: It's the only one that I  
24 didn't have --

25 MR. KUNTZ: Yup, Sandra is 25.



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1 MR. RODRIGUEZ: Thank you.

2 MR. KUNTZ: Dayeli is 26.

3 BY MR. KUNTZ:

4 Q. So Dayeli testified that she was also promised  
5 school supplies. That's true, isn't it?

6 A. Same continuing response, Madam Court  
7 Reporter.

8 Q. Dayeli Zavala doesn't have any reason to lie,  
9 does she?

10 A. Same response.

11 MR. RODRIGUEZ: Object to the form.

12 BY MR. KUNTZ:

13 Q. And she says that when she arrived outside a  
14 house in the Plaza Libertad, there were hundreds of  
15 people lined up to be tested -- there were hundreds of  
16 people lined up. That's true, isn't it?

17 A. Same response.

18 Q. Did the -- the ground team operated on  
19 occasion out of a house located near the Plaza Libertad,  
20 didn't it?

21 A. Same response.

22 Q. Okay. She says that when she swears under  
23 oath that when she reached the end of the line, she was  
24 told that to get the school supplies, she would have to  
25 provide a blood sample, that's how it worked, right? If

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1 you wanted your school supplies, you had to provide a  
2 blood sample, correct?

3 A. Same.

4 Q. All right. And she was a minor at the time,  
5 is what she says. That's correct, isn't it?

6 A. Same response, sir.

7 Q. Okay. She swore, "I understand that my mother  
8 never authorized me, since I was a minor, to be a part  
9 of the lawsuit as plaintiff, and she also never signed  
10 powers of attorney or other documents to be represented  
11 by attorneys in the United States for the purpose of  
12 suing Doe Run." That's paragraph 8 of her declaration.

13 That's the truth, isn't it?

14 A. Same response, sir.

15 Q. She was 11 years old at this time, wasn't she?

16 A. Same response, sir.

17 Q. Is the house on -- located near Plaza  
18 Libertad, is that a medical facility?

19 A. Same response.

20 Q. Was the house on -- near Plaza Libertad  
21 staffed with medical personnel?

22 A. Same response.

23 Q. Did the house at Plaza Libertad maintain  
24 medical standards of cleanliness?

25 A. Same response.

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1 Q. Take a look at the declaration, Exhibit 27.  
2 (Thereupon, Affidavit of Ada Martinez Espinoza  
3 was marked as Exhibit Number 27 for  
4 identification.)

5 BY MR. KUNTZ:

6 Q. Kind of a lot of declarations here, aren't  
7 there, sir?

8 A. Continue to refer to my initial statement,  
9 sir.

10 Q. You believe that a comment regarding the  
11 quantity of the declarations offered today would be --  
12 that a response to that question is something that is  
13 protected under the Peru Constitution?

14 A. Same response, Madam Court Reporter.

15 Q. Got it. Okay.

16 Now, this is the affidavit, Exhibit 27, of  
17 Ada Martinez, with a Z, Espinoza, with a Z. You have  
18 actually met Ms. Martinez, haven't you?

19 A. Same continuing response.

20 Q. When she was shown your photograph and given  
21 your name, she swears that she recalls that that's who  
22 she met with Victor Careaga.

23 A. Same continuing response.

24 Q. So you've met with Ada Martinez Espinoza,  
25 haven't you?

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1 A. Same response.

2 Q. Ms. Martinez Espinoza claims that documents  
3 enrolling her daughter in the Doe Run and Renco  
4 litigation were falsified. Do you see where she says  
5 that? Look at paragraph 17, 18. That happened, didn't  
6 it?

7 A. Same response, sir.

8 Q. She says that some of the information in there  
9 was actually incorrect regarding, for example, the name  
10 of the minor child who -- the name of the father of the  
11 minor child who was enrolled in the litigation. Do you  
12 see that in paragraph 18?

13 A. Same response, sir.

14 Q. And that did happen, didn't it?

15 A. Same response.

16 Q. Because, as we've established earlier on, it's  
17 a lot of names, it's a lot of DNI numbers. Sometimes  
18 mistakes were made, weren't they?

19 A. Same response, sir.

20 Q. And those mistakes are a good indication, what  
21 we call an indicia of fraud, aren't they?

22 A. Same response.

23 Q. You recall because you were a lawyer what the  
24 phrase "indicia of fraud" means, don't you?

25 A. Same response, sir.

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1 Q. And these are indicia of fraud, aren't they?

2 A. Same response, sir.

3 Q. And in this case it's kind of a twofer,  
4 because not only was the father incorrect, so is his DNI  
5 number, right?

6 A. Same response.

7 Q. Okay. Let's take a look at Number 28.

8 MR. HALPREN: Folks --

9 MR. KUNTZ: Yes.

10 MR. HALPREN: -- can we take a two-minute  
11 break, or in lieu of a two-minute break, just  
12 continue, and note that I'll be back in two  
13 minutes?

14 MR. KUNTZ: We can break, Mr. Halpren, always  
15 pause for the cause.

16 We'll go off the record.

17 THE VIDEOGRAPHER: Off record 2:45.

18 (There was a discussion off of the record.)

19 THE VIDEOGRAPHER: On record 2:53.

20 BY MR. KUNTZ:

21 Q. Thank you, sir.

22 You have before you Exhibit 28 -- oops, I'm  
23 sorry. Tell me when you're ready.

24 A. Just ten seconds.

25 Q. No worries.

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1           You have before you Exhibit 28, the affidavit  
2 of Lesly Grycel, G-R-Y-C-E-L, Anco, A-N-C-O, Galarza.

3           You see that before you, sir?

4           (Thereupon, Affidavit of Lesly Grycel Anco  
5 Galarza was marked as Exhibit Number 28 for  
6 identification.)

7           THE WITNESS: Yes.

8 BY MR. KUNTZ:

9           Q. You hired Lesly Anco to work for you, didn't  
10 you?

11          A. I refer to my statement.

12          Q. Okay. And before she was hired to work for  
13 you in 2016 and 2017, after she graduated from high  
14 school, she also swears that when she was nine, Richard  
15 Romero contacted her mother to convince her mother to  
16 enroll Ms. Anco and a minor as a plaintiff in the  
17 lawsuit. Did you know that?

18          A. I refer to my statement.

19          Q. You did know that, right?

20          A. Same continuing response.

21          Q. Okay. She states that she participated in  
22 virtual meetings with you. That's the truth, isn't it?

23          A. Same continuing response.

24          Q. Sometimes rather than travel to Peru, or just  
25 speak on the telephone, you conducted video

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1 conferencing, didn't you?

2 A. Same continuing response.

3 Q. Okay. She says that she only worked for  
4 Romero, though, for a short time. That's right, isn't  
5 it?

6 A. Same response.

7 Q. Okay. During these virtual meetings, it  
8 wasn't just you and Romero and Anco, was it?

9 A. Same response.

10 Q. Liliana Camarena, David Galarza, Lisbeth  
11 Esteban, these were all people who appeared at these  
12 virtual meetings, right?

13 A. Same response.

14 Q. And the physical location of the virtual  
15 meeting in Peru was at Romero's office in his house in  
16 La Oroya, correct?

17 A. Same response.

18 Q. Ms. Anco has no reason to lie, does she?

19 MR. RODRIGUEZ: Object to the form.

20 THE WITNESS: Same response.

21 BY MR. KUNTZ:

22 Q. Were there any of the "imputados," any of the  
23 targets of the formalization, the other 11 folks named,  
24 with whom you've had no association at all?

25 A. Same response, sir.

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1 Q. You associated with everybody there?

2 A. Same response.

3 Q. Now, Ms. Anco is the one -- is one of the  
4 people who described the flashlight forgery technique.  
5 Do you remember me referring to the flashlight forgery  
6 technique earlier on?

7 A. Same response.

8 Q. Okay. She says that she is one of the people  
9 who engage in that. There wouldn't be any reason for  
10 Lesly Anco to lie about having participated in a fraud,  
11 is there?

12 MR. RODRIGUEZ: Object to the form.

13 THE WITNESS: Same response.

14 BY MR. KUNTZ:

15 Q. You can't think of any possible advantage to  
16 someone to lie about being a part of a fraud, can you?

17 MR. RODRIGUEZ: Object to the form.

18 THE WITNESS: Same response.

19 BY MR. KUNTZ:

20 Q. She also says that she was one of the people  
21 whose fingerprints were used when they couldn't get the  
22 fingerprints of the people who were actually signing the  
23 documents, and that happened too, didn't it?

24 A. Same response.

25 Q. Is there any reason for Ms. Anco or anyone to



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1 lie about engaging in that fraudulent behavior if it  
2 weren't true?

3 MR. RODRIGUEZ: Object to the form.

4 THE WITNESS: Same response.

5 BY MR. KUNTZ:

6 Q. Okay. Ms. Anco also testified in her  
7 deposition that there was pressure from U.S. attorneys  
8 on the team. Was there pressure from the U.S. attorneys  
9 on the team?

10 A. Same response.

11 Q. If there were pressure from the U.S. attorneys  
12 on the team, that would have been largely transmitted to  
13 the team by you, correct?

14 A. Same response, sir.

15 Q. We're doing very well here.

16 Number 29, please.

17 (Thereupon, Witness statement of Blanca Felisa  
18 Santiv   ez de Esquivel was marked as Exhibit  
19 Number 29 for identification.)

20 BY MR. KUNTZ:

21 Q. Besides --

22 MR. KUNTZ: Oh, let me let the reporter mark  
23 that.

24 BY MR. KUNTZ:

25 Q. Besides lawyers at Rodriguez Tramont,

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1 Napoli Shkolnik, Halpren Santos and Schlichter Bogard,  
2 did you work with any other lawyers with respect to the  
3 work of the ground team in Peru?

4 A. Same continuing response.

5 Q. You didn't, did you?

6 A. Same response, sir.

7 Q. Oh, no. Strike that.

8 Mr. Thaler, I forgot Mr. Thaler. You worked  
9 with him as well, didn't you?

10 A. Same response.

11 Q. Other than those five firms, did you work with  
12 any other lawyers?

13 A. Same response.

14 Q. Okay. So Exhibit 29 is a witness statement by  
15 Blanca Felisa, with an S, Santiváñez de Esquivel. I'll  
16 spell Santiváñez, S-A-N-T-I-V-Á-Ñ-E-Z. You have it in  
17 front of you, sir.

18 Now, this witness statement is a statement  
19 that she gave to the Fiscalía, F-I-S-C-A-L-I-A, the  
20 prosecutor in Peru, but it's also given under oath,  
21 isn't it?

22 A. Same continuing response.

23 Q. Has the prosecutor in Peru asked you to come  
24 in and give your statement under oath?

25 A. Same continuing response.

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1 Q. Do you know of any reason why Blanca  
2 Santiváñez, I know I'm not getting that right, but why  
3 Ms. Blanca would have to lie to the prosecutor?

4 A. Same continuing response.

5 Q. In fact, people generally under oath to  
6 prosecutors tell the truth, don't they?

7 MR. RODRIGUEZ: Object to the form.

8 THE WITNESS: Same continuing response.

9 BY MR. KUNTZ:

10 Q. I mean, if you were under oath in front of a  
11 prosecutor, you would tell the truth, wouldn't you?

12 A. Same continuing response.

13 Q. Can you tell me how your refusal to answer my  
14 question regarding your truthfulness to a prosecutor  
15 under oath implicates the rights on which you predicate  
16 your refusal to answer today?

17 A. Same response, sir.

18 Q. Thank you.

19 So Ms. Santiváñez says that her son was  
20 included in the Collins lawsuit without her consent.  
21 That's true, isn't it?

22 A. Same continuing response.

23 Q. She says that "Sometime in 2007, when school  
24 was about to start, three people dressed in white came  
25 to my house."

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1 Were you aware that three people dressed in  
2 white had gone to Ms. Santiv   ez' house?

3 A. Same response.

4 Q. One of the women told her that they were there  
5 to draw blood from children because of a problem at Doe  
6 Run Company.

7 Were you aware that people were going door to  
8 door to draw blood from children?

9 A. Same response, sir.

10 Q. They were doing that, weren't they?

11 A. Same response.

12 Q. Is a door -- a door-to-door blood draw of a  
13 child certainly isn't being conducted in a medical  
14 facility, is it?

15 A. Same response, sir.

16 Q. It's interesting, because Ms. Santiv   ez says  
17 that she meets Cecilia Lujana. Did you know that  
18 Ms. Santiv   ez had met Cecilia Lujana?

19 A. Same response, sir.

20 Q. Cecilia Lujana was working with the ground  
21 team, right?

22 A. Same response.

23 Q. Okay. Ms. Santiv   ez says that she has never  
24 participated to accept any claim against the defendants  
25 in the Eastern District case. That's right, isn't it?

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1 A. Same response, sir.

2 Q. You're not going to tell me if what she says  
3 is true or not, but you do know if what she says is true  
4 or not, don't you?

5 A. Same response.

6 Q. In fact, you know whether any or all of these  
7 sworn statements I've been reading out to you, you know  
8 whether any or all of them are true, don't you?

9 A. Same response to all of the questions that you  
10 have asked.

11 Q. Right. You don't want to tell me whether they  
12 are true or not, but you know whether they are true or  
13 not, don't you?

14 A. I'm invoking my constitutional rights and  
15 privileges under Peruvian law, just like my -- just like  
16 the statement that I read at outset of this deposition.

17 Q. Are you a citizen of Peru?

18 A. I continue to defer to my statement.

19 Q. You're not a citizen of Peru, are you?

20 A. I continue to defer to my statement. You can  
21 ask me the question many ways and I'm going to give you  
22 the same answer, sir.

23 Q. All right, sir.

24 And, sir, I'm honestly not trying to be  
25 disrespectful. Your job apparently is to refuse to



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1 MR. KUNTZ: You all will be happy to know that  
2 I think we have only 40 exhibits. So we're almost  
3 done.

4 Oh, yeah, we'll take a break in a little  
5 while.

6 BY MR. KUNTZ:

7 Q. Sir, I've given you Exhibit 30. This is a  
8 witness statement by Samir Yordy, with a Y, Esquivel  
9 Santiv   ez to the public prosecutor in Junin, J-U-N-I-N.

10 Mr. Esquivel told the public prosecutor that  
11 he had no idea --

12 MR. KUNTZ: I don't know what part of "in a  
13 depo" you don't understand, son.

14 BY MR. KUNTZ:

15 Q. He told the public prosecutor that he had no  
16 idea until he was in the public prosecutor's office  
17 giving this statement that he had been a participant, a  
18 party in a lawsuit in Missouri in the United States  
19 against the Doe Run Company.

20 Did you know that?

21 A. Same continuing response.

22 Q. Okay. Mr. Esquivel says that he was signed up  
23 without his knowledge. That happened, didn't it?

24 A. Same continuing response.

25 Q. He said that he never saw his plaintiff

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1 profile sheet, and there are a lot of people who never  
2 saw their plaintiff profile sheets, aren't there?

3 A. Same continuing response.

4 Q. Moreover, Mr. Esquivel's profile sheet  
5 describes various -- well, you know what, we'll look at  
6 his in a second.

7 Yeah, and he told the public prosecutor that  
8 he never repeated a year in school. No reason for him  
9 to lie about that, is there?

10 A. Same --

11 MR. RODRIGUEZ: Object to the form.

12 THE WITNESS: -- continuing response, sir.

13 BY MR. KUNTZ:

14 Q. He said that he was in the top ranks in his  
15 elementary school. No reason for this man to lie to the  
16 public prosecutor, is there?

17 MR. RODRIGUEZ: Object to the form.

18 THE WITNESS: Same continuing response.

19 BY MR. KUNTZ:

20 Q. And that in secondary -- in secondary school  
21 he passed all of his subjects?

22 A. Same continuing response.

23 Q. Right.

24 And yet Mr. Esquivel's plaintiff profile  
25 sheet, which we're marking as 31 --



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1 (Thereupon, Samir Yordy Esquivel Santiv   ez  
2 profile sheet was marked as Exhibit Number 31  
3 for identification.)

4 BY MR. KUNTZ:

5 Q. Let me back up for just a second.

6 Sir, this is the first one of these that we've  
7 introduced. You're familiar with this document, aren't  
8 you?

9 A. Same continuing response.

10 Q. This is a plaintiff profile sheet of the sort  
11 that's in common use in this litigation -- in the  
12 litigation in the Eastern District?

13 A. Same response.

14 Q. All right. And you note on the bottom, much  
15 larger this time so we don't need the magnifying glass,  
16 a Bates number indicating that this document was  
17 produced in the lawsuit in Eastern Missouri?

18 A. Same response.

19 Q. Right.

20 And Mr. Esquivel who says that he never saw  
21 his plaintiff profile sheet before, also says he was  
22 surprised to find out about -- let's go to page 7.  
23 Page 7, up at the top it's checked off that Mr. Esquivel  
24 has a learning impairment, "permanent long-term  
25 difficulty reading comprehension."

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1           You see that there, don't you?

2           A.    Same continuing response, Madam Court  
3 Reporter.

4           Q.    Okay. And despite this information on his  
5 plaintiff profile sheet, which Esquivel says he never  
6 saw, in fact, Mr. Esquivel is a college graduate with  
7 business administration degree, I think.

8           Did you know that?

9           A.    Same continuing response.

10          Q.    This is just one example, an example that was  
11 produced in this litigation -- not in this litigation,  
12 in the Eastern District litigation, one of the Eastern  
13 District litigations. This is just one example of a  
14 plaintiff profile sheet that the supposed plaintiff had  
15 nothing to do with it, isn't it?

16          A.    Same continuing response.

17          Q.    Do you know in which litigation this Bates  
18 number operated?

19          A.    Same response.

20          Q.    Do you know if Mr. Rodriguez' firm is the firm  
21 that produced this plaintiff profile sheet in the  
22 litigation?

23          A.    Same response.

24          Q.    Do you know if instead it was the Thaler firm?

25          A.    Same response.

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1 Q. Or the Halpren firm?

2 A. Same response.

3 Q. Or the Napoli firm?

4 A. Same response.

5 Q. Or the Schlichter response?

6 A. Same response.

7 Q. But it sure was produced in the litigation,  
8 wasn't it?

9 A. Same response, sir.

10 Q. Would it be an act of your stated re- -- would  
11 it be an act of disrespect to the Eastern District of  
12 Missouri to submit a false document for discovery in a  
13 matter pending in that court?

14 A. Same continuing response, Madam Court  
15 Reporter.

16 Q. But you were willing to tell me how much  
17 respect you have for the Eastern District?

18 A. You asked that question half a dozen times, I  
19 believe. You have the same answer.

20 Q. Got it.

21 32, please.

22 (Thereupon, Witness statement of Yoselin  
23 Segundina Rosales Vicente was marked as Exhibit  
24 Number 32 for identification.)

25 BY MR. KUNTZ:

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1 Q. So you have before you, sir, the witness  
2 statement of Yoselin, with a Y, Segundina Rosales  
3 Vicente to the public prosecutor in the jurisdiction of  
4 Junin, Exhibit 32.

5 Do you see it there?

6 A. I have the document in front of me.

7 Q. Okay. Have you looked at it?

8 A. No.

9 Q. Would you like to?

10 A. No.

11 Q. Don't need to see what's in there?

12 A. No.

13 Q. Okay. Why not?

14 A. I refer to my statement.

15 Q. Got it.

16 So we've established Cecilia Lujan worked for  
17 you, right?

18 A. I refer to my statement.

19 Q. Okay.

20 A. You continue to ask the same questions as  
21 you've asked hours ago. So you will be receiving the  
22 same response.

23 Q. Got it.

24 Ms. Rosales says that in September of 2014.  
25 Her mom took her to a meeting at the Coliseum in the

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1 municipality of Chucchis, C-U-C-C-H-I-S [sic], on Calle  
2 Miraflores in la Oroya.

3 Have you ever been to that coliseum?

4 A. Same response.

5 Q. In fact, sir, isn't that the self -- same  
6 coliseum that's depicted in the video that's Exhibit 12  
7 to this deposition?

8 A. Same response.

9 Q. You've been there more than a few times,  
10 haven't you?

11 A. Same response, sir.

12 Q. Okay. She says that in 2014, Cecilia Limas  
13 Lujan, who was her mother's friend, told her mother that  
14 if she got a blood test for lead, then the "gringos"  
15 were going to give her compensation.

16 That happened, didn't it?

17 A. Same response, sir.

18 Q. So the folks in La Oroya and Huancayo and  
19 environs often refer to Americans who visit there as  
20 "gringos," correct?

21 A. Same response.

22 Q. Do they refer to you as a "gringo" or do they  
23 think of you as more of a countryman?

24 A. Same response.

25 Q. Okay. Ever heard anybody call you a "gringo"?

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1 A. Same response.

2 Q. Nobody ever said, Dr. "Gringo"?

3 A. You can ask the question many ways, same  
4 response.

5 Q. Okay. Mrs. Rosales puts Ms. Lujana and  
6 Mr. Romero together speaking about the benefits of --  
7 the benefits people would receive from nongovernmental  
8 organizations if they participated in the lawsuit,  
9 doesn't she?

10 A. Same response.

11 Q. That's exactly of a piece with everything that  
12 we have talked about before the operations of the ground  
13 team and their leveraging of NGO like "Vaso de Leche,"  
14 correct?

15 A. Same response.

16 Q. Sir, I know that you say that I've asked the  
17 same question over and over, but part of the point here  
18 is -- it's a pretty hefty stack of people who all say  
19 the exact same thing under oath about what happened in  
20 Peru. That gives it a certain indicia of veracity,  
21 doesn't it, sir?

22 MR. RODRIGUEZ: Object to the form.

23 THE WITNESS: That's your opinion, and I refer  
24 to my statement.

25 BY MR. KUNTZ:

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1 Q. Okay.

2 A. Your self-serving opinion.

3 Q. Okay. You don't think it's the case that  
4 something that many people swear to is more likely to be  
5 true than something no one will swear to?

6 A. I continue to refer to my statement.

7 Q. You don't think it's the case that when many  
8 people's sworn statements overlap and corroborate one  
9 another, that that's not an indicia that the sworn  
10 statements are true?

11 A. Not if they have been paid to do so.

12 Q. Is it your opinion that all of the people that  
13 we've talked about here in these declarations have been  
14 paid to give their declarations?

15 A. I refer to my initial statement.

16 Q. Well, sir, you just answered a question.  
17 Okay. You just answered a question and you said,  
18 response my --

19 MR. KUNTZ: In fact, would you read the  
20 question that I asked that elicited the answer, Not  
21 if they've been paid for.

22 (A portion of the record was read by the court  
23 reporter.)

24 BY MR. KUNTZ:

25 Q. Sir, why did you answer that question and not

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1 invoke the privilege upon which you're predicating your  
2 refusal to answer all of the other questions?

3 A. I now refer to my statement, and I felt it  
4 appropriate to respond to that question.

5 Q. Like you just answered my question now?

6 A. And I refer back to my statement.

7 Q. So it's your view that you can answer which  
8 questions you please to answer and refuse to answer  
9 which questions you don't please to answer under the  
10 privilege that you stated at the beginning of our  
11 deposition?

12 A. I refer to my statement.

13 Q. Got it.

14 Let's talk about the second time that Yoselin  
15 Rosales went to speak with the prosecutor.

16 MR. RODRIGUEZ: Thank you.

17 This is the same person?

18 MR. KUNTZ: Yeah.

19 MR. RODRIGUEZ: Yeah, it's the same person.

20 MR. KUNTZ: Yeah, Yoselin.

21 BY MR. KUNTZ:

22 Q. So you have in front of you Exhibit 33, which  
23 is another witness statement and actually entitled a  
24 "Supplemental Witness Statement of Yoselin Segundina  
25 Rosales" to the public prosecutor in the jurisdiction of



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1 Junin.

2 Why don't you read that one, sir. Would you  
3 like to read that one before I ask you questions?

4 (Thereupon, Supplemental Witness Statement of  
5 Yoselin Segundina Rosales was marked as Exhibit  
6 Number 33 for identification.)

7 THE WITNESS: I refer to statement. I won't  
8 be reading anything

9 BY MR. KUNTZ:

10 Q. You won't be reading anything.

11 Okay. Well, then you're going to have to  
12 trust me to read it to you, I guess.

13 Ms. Segundina describes a visit from someone,  
14 a woman whose name she didn't know, to tell her that  
15 some family members had arrived and that she wanted to  
16 see if I was there.

17 That is what it says here. Okay? Do you  
18 believe me?

19 A. I refer to my statement, sir.

20 Q. Well, you're not looking at the document. You  
21 know, you're allowed to not answer, but if you're going  
22 to stop me from asking because you won't even look at  
23 the document again, as I described using a technical  
24 legal term, it's another kettle of fish.

25 A. I don't need to look at the statement to tell

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1 you that I refer to my statement -- the statement at the  
2 outset of this deposition.

3 Q. Okay. Well, then I'll just characterize it.  
4 And what she basically says is that she was -- received  
5 a visit that pressured her to not make statements about  
6 what had happened with regard to this lawsuit.

7 Did you know that that had happened?

8 A. I refer to my statement. Continue -- the same  
9 continuing response.

10 Q. Were you involved in any way in pressuring  
11 Yoselin into not cooperating with the prosecutor in the  
12 jurisdiction of Junin?

13 A. Same continuing response.

14 Q. Do you know if Mr. Rodriguez was involved in  
15 any way in pressuring a witness not to participate with  
16 the prosecutor?

17 A. Same response.

18 Q. Do you know if any of the -- we'll capture  
19 them all.

20 If any of the lawyers at the five firms were  
21 involved in any way in pressuring Ms. Yoselin not to  
22 cooperate?

23 A. I refer to my continuing response.

24 Q. So you're not prepared to deny that you  
25 pressured Ms. Yoselin or directed her to be pressured,

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1 correct?

2 A. I refer to my statement at in the beginning of  
3 this deposition.

4 Q. Okay. Let's look at 34.

5 MR. KUNTZ: 34 is a compound exhibit, our  
6 first one. There's two pieces, right? There's  
7 this and then there's the PPS.

8 Yeah, that's it. That's the PPS. So  
9 everybody gets one of those. One from the front  
10 and one from the back.

11 MS. NICHOLSON: Do you have a marked copy of  
12 this one?

13 MR. KUNTZ: No, no, I don't have an RJK copy  
14 of that. That's fine.

15 Thanks.

16 MS. NICHOLSON: I'm sorry. Bear with me.

17 (Thereupon, Witness Statement of Rosalinda Iris  
18 Vicente Rosales was marked as Composite Exhibit  
19 Number 34 for identification.)

20 BY MR. KUNTZ:

21 Q. So before you, sir, are two pieces comprising  
22 one exhibit, compound Exhibit 34, and the first part of  
23 that exhibit is a witness statement of Rosalinda Iris --  
24 Iris Vicente Rosales to the public prosecutor in Junin.

25 Do you see that there?

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1 A. I refer to my statement.

2 There is a document in front of me.

3 Q. Well, sir, are you looking at the same  
4 document I'm at, the witness statement of Rosalinda Iris  
5 Vicente Rosales?

6 A. I refer to my statement.

7 MR. RODRIGUEZ: Robert, is that 34?

8 Excuse me.

9 MR. KUNTZ: Yes, 34. Together those two make  
10 34. For my own I'm going to say -- okay.

11 BY MR. KUNTZ:

12 Q. So you're relying on the constitutional  
13 privileges of -- afforded you by the Constitution of  
14 Peru to decline to tell me whether you see this document  
15 in front of you?

16 A. There's a document in front of me.

17 Q. Right.

18 And to -- you're going to decline to tell me  
19 whether it's the witness statement of Rosalinda Iris  
20 Vicente Rosales?

21 A. Absolutely.

22 Q. Okay. So let's flip to paragraph 25 of her  
23 statement.

24 Would you like to flip to paragraph 25?

25 A. No, I will not.

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1 Q. Okay. I'm going to ask you about it. It will  
2 be easier if you can see it.

3 A. No, it won't.

4 Q. Okay. Because you're going to refuse to  
5 answer no matter what it says?

6 A. Absolutely.

7 Q. Based on your privilege under the Constitution  
8 of Peru?

9 A. Absolutely.

10 Q. Got it.

11 Okay. Well, for the record, I'll say that in  
12 this paragraph she's asked about her personal profile  
13 sheet, and she says, "No, I have never seen that  
14 document."

15 That's what she says, you'd know that if you  
16 would read it, but you're going to trust me that that is  
17 what it says?

18 A. I'm referring to my statement.

19 Q. Got it.

20 And then the second part of this is the  
21 personal profile sheet that she says, I have never seen.

22 And if you page back to the personal profile  
23 sheet -- oh, let's note for the record before we do  
24 that, that the personal profile sheet, like some other  
25 documents we've looked at, contains Bates numbers on the

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1 bottom, doesn't it?

2 A. I'm not commenting on the document, sir.

3 Q. Does it contain Bates numbers on the bottom?

4 A. I'm referring to my statement, and I'm not  
5 commenting on the document.

6 Q. Got it.

7 And those Bates numbers indicate that this  
8 document, the profile sheet, was produced in the Eastern  
9 District of Missouri in one of the litigations, right?

10 A. I continue to refer to my statement.

11 Q. Right.

12 And if we go all the way back here, Spanish  
13 language is the one on top this time, to page  
14 PL\_DoeRun1-028397, we see a signature and a thumb --  
15 well, and a fingerprint, don't we?

16 A. I continue to refer to my statement.

17 Q. And there is also another signature under  
18 that, it's -- oh, I'm sorry, no.

19 There is a signature, and then there's the  
20 name printed out. And the name is Yoselin Segundina  
21 Vicente Rosales, isn't it?

22 A. Same response.

23 Q. And yet this witness, Ms. Vincente, says that  
24 she never saw this personal profile statement --  
25 personal -- this personal -- the personal -- plaintiff

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1 profile sheet.

2 MR. RODRIGUEZ: For the record, just I'm --  
3 just so it's clear, there is two different persons  
4 here. There is what appears to be the daughter and  
5 the mother.

6 MR. KUNTZ: Right.

7 MR. RODRIGUEZ: The mother is the one that it  
8 looks to me anyway that -- if I have this  
9 correct -- no, the daughter -- wait a minute.

10 The daughter signed the profile, and this is  
11 the witness statement of the mother?

12 I just want the record to be accurate. It's  
13 all back and forth.

14 MR. KUNTZ: Got it.

15 So this is the witness statement of Rosalinda  
16 Iris Vincente Rosales.

17 MR. RODRIGUEZ: The mother?

18 MR. KUNTZ: Yes.

19 MR. RODRIGUEZ: Okay.

20 MR. KUNTZ: And the signature on the back --  
21 there are two signatures on page -- the page number  
22 I read out, and one of those signatures is  
23 Rosalinda Iris Vincente Rosales.

24 MR. RODRIGUEZ: In mine, Robert, I may be  
25 missing something, but I don't have a signature for

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1 Rosalinda. I have a signature for Yoselin.

2 MR. KUNTZ: Right. Okay.

3 BY MR. KUNTZ:

4 Q. Mr. Careaga, is it possible for someone to  
5 sign something that they have never seen?

6 A. I'm referring to my statement.

7 Q. Okay. And if you knew that something had been  
8 signed by someone other than the signatory, you wouldn't  
9 submit that to the Eastern District of Missouri for  
10 which you have such respect, would you?

11 A. Same continuing response.

12 MR. KUNTZ: Let's do this: Let's take 35, 36,  
13 and 37, and 38, and 39, and let's stack them up.  
14 Just give me those remaining exhibits, and I'll  
15 help you mark them all in order, because I want to  
16 get us to a break, and then we're going to come  
17 back and we're going to be done in a better time  
18 than I promised.

19 MS. NICHOLOS: This is 35.

20 MR. KUNTZ: Is that mine?

21 MS. NICHOLOS: I don't see a --

22 MR. KUNTZ: Okay. I might not have marked it.  
23 That's fine.

24 MS. NICHOLOS: Yeah.

25 MR. KUNTZ: Okay.



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1 MS. NICHOLOS: Okay. One at a time. 35.

2 MR. KUNTZ: Give the witness 35.

3 Yeah, that's good.

4 MS. NICHOLOS: 35.

5 (Thereupon, Sworn Declaration of Lizbeth Cyntia  
6 Gutierrez Gomez was marked as Exhibit Number 35  
7 for identification.)

8 MS. NICHOLSON: Exhibit 36.

9 MR. KUNTZ: Yeah, 36 is Burgos Romero.

10 (Thereupon, Sworn Declaration of Angelica Pilar  
11 Burgos Romero was marked as Exhibit Number 36  
12 for identification.)

13 MR. RODRIGUEZ: Thank you.

14 MR. KUNTZ: 37 is the PPS of Gutierrez Burgos.  
15 (Thereupon, PPS of a minor A.R. was marked as  
16 Exhibit Number 37 for identification.)

17 MR. KUNTZ: Yeah, these last ones are  
18 individual exhibits. I'm just going to try and  
19 speed us through these.

20 MR. RODRIGUEZ: The sworn declaration of  
21 Lizbeth --

22 MR. KUNTZ: When we get them all on the table,  
23 I'll run through them all.

24 MR. RODRIGUEZ: Fine. Fine.

25 MS. NICHOLOS: 37. 37.

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1 MR. RODRIGUEZ: Thank you. 37. Okay.

2 MR. KUNTZ: And there's just two more, 38 and  
3 39.

4 (Thereupon, Declaration of Witness Mishel Melisa  
5 Godino Pena was marked as Exhibit Number 38 for  
6 identification.)

7 (Thereupon, PPS Mishel Melisa Godino Pena was  
8 marked as Exhibit Number 39 for identification.)

9 MR. KUNTZ: And then 38 is the declaration of  
10 Godino Pena, and 39 is the PPS.

11 It will save Meagan from having to get up and  
12 down and up and down.

13 MS. NICHOLOS: It's okay.

14 MR. KUNTZ: All right. Does the court  
15 reporter have 39?

16 All right. So I'm going to make a record here  
17 so we can just walk through this.

18 Reject that call.

19 Exhibit 35 is the sworn declaration of Lizbeth  
20 Cyntia Gutierrez Gomez.

21 36 is the sworn declaration of Angelica Pilar  
22 Burgos, B-U-R-G-O-S, Romero.

23 37 is a plaintiff profile sheet of -- hold on.  
24 Let's put a name to it so we don't lose track.

25 Stand by.

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1 37 is plaintiff profile sheet -- oh, this is  
2 of a minor. A plaintiff profile sheet with the  
3 initials A.R.

4 38 is the declaration of a witness Mishel  
5 Melisa, with one L, Godino, G-O-D-I-N-O, Peña with  
6 an Ñ.

7 And 39 is the plaintiff profile sheet of  
8 Mishel Melisa Godino Peña.

9 BY MR. KUNTZ:

10 Q. All right. So we have all of those in front  
11 of us now. Mr. Careaga, in an effort to be efficient  
12 and save you to having you repeat yourself too much,  
13 will you look at those?

14 A. I have the documents in front of me.

15 Q. Great.

16 Lizbeth Cyntia Gutierrez Gomez, does she have  
17 any reason to lie under oath?

18 MR. RODRIGUEZ: Object to the form.

19 THE WITNESS: I refer to my statement.

20 BY MR. KUNTZ:

21 Q. She says that she did not authorize her  
22 participation of her children in any lawsuit in the  
23 United States. That's true, isn't it?

24 A. Same continuing response.

25 Q. Okay. 36 is the declaration of Angelica Pilar

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1 Burgos Romero. She says that her minor child was  
2 included in Collins without authorization. That's true,  
3 isn't it?

4 A. Same response, sir.

5 Q. 37 is plaintiff profile sheet, it's got a  
6 Collins Bates stamp on it. It's a little difficult to  
7 read here, it's -- it starts with CollinsPL\_010447. She  
8 said that she never filled that out. That's true, isn't  
9 it?

10 A. Same response.

11 Q. Same response.

12 38, that's the declaration of Michel Melisa  
13 Godino. She says she was included in the Reed lawsuit  
14 without her authorization or her father's back when she  
15 was a minor. That's true, isn't it?

16 A. Same continuing response.

17 Q. She's got no reason to lie, does she?

18 A. Same continuing response.

19 Q. She said that she didn't fill out a PPS, but  
20 Exhibit 37 -- or Exhibit 39 purports to be a plaintiff  
21 profile sheet listing her. Is she telling the truth  
22 when she says that she didn't fill that out?

23 A. Same continuing response.

24 Q. Any reason she'd lie?

25 MR. RODRIGUEZ: Object to the form.

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1 THE WITNESS: Same continuing response.

2 BY MR. KUNTZ:

3 Q. Would you take a look at page 14 of  
4 Exhibit 39. Now, that's the translation, and if you  
5 want to, you can just turn all the way back to the very  
6 last page of that exhibit where the Spanish appears.

7 Do you recognize that signature?

8 A. Same continuing response.

9 Q. Do you recognize the name Eduardo Ayala Maura?

10 A. Same continuing response.

11 MR. KUNTZ: A-Y-A-L-A, M-A-U-R-A.

12 BY MR. KUNTZ:

13 Q. Okay. See, we disposed of those quickly.

14 MR. KUNTZ: Okay. We're going to take a break  
15 for ten minutes or so, and we will come back. And  
16 I now can promise with some assurance, promise that  
17 we will be off the record for good today at 4:30.

18 THE VIDEOGRAPHER: Off record 3:33 p.m.

19 (There was a discussion off of the record.)

20 THE VIDEOGRAPHER: On record 3:51.

21 MR. KUNTZ: Thanks so much.

22 So I'm going to have Ms. Nicholson give you  
23 our last exhibit of the day, which is a composite  
24 exhibit that we are going to mark as Number 40.

25 (Thereupon, R. Regul. FL. Bar 4-7.18 was marked

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1 as Exhibit Number 40 for identification.)

2 BY MR. KUNTZ:

3 Q. Mr. Careaga, for whatever it's worth, I'm  
4 going to ask you to page through that composite exhibit,  
5 because it's not all one thing. I'm going to be asking  
6 you about it, and that way you will at least have seen  
7 the documents that are under discussion.

8 Okay. You didn't really have much of a chance  
9 to really see anything in there just now, did you?

10 A. I refer to my statement at the beginning of  
11 the deposition.

12 Q. Okay. So you were at one time a licensed  
13 attorney, and you're aware that attorneys in Florida  
14 operate under a set of rules set down by the Florida  
15 Bar, correct?

16 A. Same continuing response.

17 Q. Among those rules is this Rule 4-7.18. You're  
18 familiar with that rule, aren't you?

19 A. Same continuing response.

20 Q. You're aware, aren't you, that that rule makes  
21 in-person solicitation of a potential client a violation  
22 of the rule.

23 It says, "A lawyer may not solicit in person  
24 or permit employees or agents of the lawyer to solicit  
25 in person on the lawyer's behalf professional employment

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1 from a prospective client with whom the lawyer has no  
2 family or prior professional relationship," et cetera.

3 You're familiar with that rule, aren't you?

4 A. Same continuing response.

5 Q. Your activities as the director of the ground  
6 team in Peru routinely violated this rule, didn't they?

7 A. Same continuing response.

8 Q. Both on your own behalf when you were an  
9 attorney and on behalf of the attorneys for whom you  
10 were working as an agent or employee, correct?

11 A. Same continuing response.

12 Q. Okay. Not only -- turning to the next  
13 document in the composite exhibit.

14 Not only does such solicitation violate the  
15 rules of professional conduct set down by the Supreme  
16 Court of the State of Florida, it's actually a crime as  
17 well, isn't it?

18 A. Same continuing response.

19 Q. Are you familiar with what is in front of you  
20 now, Florida Statute 877.02, "Solicitation of legal  
21 services or retainers therefore, penalty"?

22 A. Same continuing response.

23 Q. You're familiar with the Florida Statutes  
24 generally speaking, right? You know what those are?

25 A. Same continuing response.

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1 Q. Have you ever read this one?

2 A. Same continuing response.

3 Q. You're aware, aren't you, that the  
4 solicitation -- the in-person solicitation by an  
5 attorney or by his employer or agent that violates the  
6 Rule 4-718, it's also a violation of the Florida  
7 Criminal Code, aren't you?

8 A. Same continuing response.

9 Q. Okay. And there's another provision in the  
10 Florida Criminal Code, you can turn -- you can turn to  
11 the next one if you want, or, you know, not, if you'd  
12 like. Florida Statute 454.23 sets out penalties for  
13 violations of other statutes, doesn't it?

14 A. Same continuing response.

15 Q. And, in particular, this sets out as a penalty  
16 that that's -- that the person who does the behavior I  
17 just described, that's a -- that's a felony in the 3rd  
18 degree, isn't it?

19 A. Same continuing response.

20 Q. Strike that.

21 Sorry about that.

22 These penalties -- this is about somebody who  
23 presents themselves in the unlicensed practice of law,  
24 right? Were you engaged in the unlicensed practice of  
25 law in Peru when you held yourself out as an attorney?



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1 A. Same continuing response.

2 Q. When you operated on behalf of attorneys in  
3 the United States?

4 A. Same continuing response.

5 Q. Okay. Now, as a disbarred Florida lawyer,  
6 you're probably familiar with another set of rules laid  
7 down by the Supreme Court and the Florida Bar. Draw  
8 your attention to 3-6.1 of the rules regulating lawyers.  
9 Are you familiar with that provision?

10 A. Same response, sir.

11 Q. Okay. You knew, didn't you, that when you  
12 became employed with a law firm, that after your  
13 disbarment, that the law firm was required to provide to  
14 the Bar and notice of your employment, correct?

15 A. Same continuing response.

16 Q. And you knew that certain conduct was  
17 prohibited to you when working in a law firm as a  
18 disbarred Florida lawyer, didn't you?

19 A. Same continuing response.

20 Q. For example, client contact was prohibited to  
21 you as a disbarred lawyer working in a Florida law  
22 office, correct?

23 A. Same continuing response.

24 Q. For example, when you worked for Mr. Thaler,  
25 correct?

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1 A. Same continuing response.

2 Q. For example, when you worked for  
3 Mr. Rodriguez, correct?

4 A. Same response.

5 Q. Okay. You were also aware, weren't you,  
6 because you signed them more or less every quarter, of  
7 the provision of 3.61(e) that requires a quarterly  
8 report by the disbarred lawyer employee and by the law  
9 firm to the Bar, you were aware of that requirement,  
10 weren't you?

11 A. Same response.

12 Q. Let me show you a correspondence, paging  
13 through our exhibit. You want to keep up with me?

14 There is some correspondence in here that  
15 begins with an e-mail from Louis Thaler to L. Chason of  
16 the Florida Bar, and in the way of these e-mail strings  
17 you sort of have to read it from the -- the front to the  
18 back. So let me turn you over to the second page there.

19 So you see an e-mail from -- you want to  
20 follow me or no?

21 A. No, I don't need to.

22 Q. Okay. You see an e-mail from Kenneth L.  
23 Marvin of the Florida Bar to Mr. Thaler. Did you  
24 receive that? Did you look at that e-mail when it was  
25 sent to Mr. Thaler?

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1 A. I refer to statement again.

2 Q. In this e-mail Mr. Marvin says to Mr. Thaler,  
3 "Thank you for your letter. You may not utilize  
4 Mr. Careaga as a translator as he would then be having  
5 direct contact with clients. The rule does not allow  
6 him to have any type of direct contact even though you  
7 are present during the time that he is having that  
8 direct contact."

9 Have you read that correspondence from  
10 Mr. Marvin?

11 A. Same continuing response.

12 Q. And you were aware that you were prohibited  
13 from client contact, weren't you?

14 A. Same continuing response.

15 Q. You were aware that you were prohibited from  
16 translating in -- for a client, weren't you?

17 A. Same continuing response.

18 Q. So be aware, all of these restrictions you  
19 filled out the quarterly reports required by Rule 3-6.1,  
20 including the example that is the last part of our  
21 Composite Exhibit 40.

22 On the first page of that, sir -- do you want  
23 to look at yours or do you want me to point to mine?

24 A. Same continuing response.

25 Q. Okay. That's your signature, isn't it, where

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1 it says "Victor Careaga"?

2 A. Same response.

3 Q. That is your signature?

4 A. Same response, sir.

5 Q. Okay. How would acknowledging that this is  
6 your signature, which, by the way, is notarized and  
7 states to be -- which is notarized, how would stating  
8 that that's your signature on a document sent to the  
9 Florida Bar possibly implicate the rights on which  
10 you're standing granted to you by the Peruvian  
11 Constitution with respect to a Peruvian criminal  
12 investigation?

13 A. The document speaks for itself.

14 Q. So now your answer is that the document speaks  
15 for itself. So now we're going to answer.

16 Awesome.

17 So the document speaks for itself, and that's  
18 your signature, right?

19 A. I don't need to answer anything further about  
20 the document, it speaks for itself.

21 Q. Well, the document can't speak to whether that  
22 is your signature or not. It's just a document. You  
23 have to say whether that's your signature or not, and it  
24 is?

25 A. That document speaks for itself, including

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1 signatures.

2 Q. Okay. And Gloria Webb Brooks who notarized  
3 your signature, she wouldn't lie that that was your  
4 signature, would she?

5 A. I continue to refer to my statement.

6 Q. Okay. How does the Peruvian Constitution  
7 purported protections with respect to a Peruvian  
8 criminal investigation empower you not to answer whether  
9 Gloria Brooks properly notarized your signature on this  
10 document?

11 A. The document speaks for itself.

12 Q. That is not an answer to my question.

13 A. It's going to be the best answer that I can  
14 give you.

15 Q. Okay. So you're not -- so you're just going  
16 to refuse to answer even though you really don't have a  
17 basis for refusal?

18 A. That's the best answer that I can give you,  
19 the document speaks for itself.

20 Q. Okay. And you don't want to tell me what your  
21 basis for refusing to answer is?

22 A. I'm not commenting any further on the  
23 document.

24 Q. That's a diff- -- understand that.

25 I'm asking why you won't comment any further

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1 on the document. Do you want to give me an answer as to  
2 why you won't comment?

3 A. No, it's not necessary.

4 Q. So you're going to not tell me why you're not  
5 answering because you don't believe it's necessary for  
6 you to tell me?

7 A. I'm not commenting on the document.

8 Q. I'm not asking you about the document anymore.  
9 Not even looking at the document.

10 The question is this: Why won't you comment  
11 on whether that is your signature or not? And as I  
12 understand it, you've told me your answer is because --  
13 because it's not necessary? Is that your answer?

14 A. You can have the court reporter read back my  
15 answers.

16 Q. Okay. Well, I think if we did, it would be  
17 that it's not necessary.

18 And the privilege upon which you predicate  
19 your refusal to answer this question while you're here  
20 under subpoena is what?

21 A. I'll refer to my statement at the beginning of  
22 deposition.

23 Q. Got it.

24 Okay. And when we turn that page over, we see  
25 that not only are you attesting to what's above, and

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1 we'll talk about what's above in a minute, also  
2 attesting to the truth of what's above is Paulino A.  
3 Nunez, Jr., Esquire, correct?

4 A. The document speaks for itself, and I continue  
5 to refer to my statement.

6 Q. And Mr. Paulino Nunez, Jr., Esquire is the  
7 Nunez in Rodriguez Tramont Nunez, isn't he?

8 A. I continue to refer to my statement, and the  
9 document speaks for itself.

10 Q. And let's look at what it was you swore to in  
11 this document that spoke for itself. You swore that,  
12 number 4, "No aspect of the employee's work has involved  
13 the unlicensed practice of law."

14 And this is for the quarterly period ending  
15 June 30, 2016. Was that statement true when you swore  
16 to its truth?

17 A. I refer to my statement.

18 Q. Okay. So the fact that we see you on video in  
19 the second week of June 2016 translating and having  
20 direct contact with clients doesn't make number 4 to  
21 which you swore here a lie?

22 A. The document speaks for itself, sir.

23 Q. But it's a lie, isn't it?

24 A. The document speaks for itself.

25 Q. Okay. Number 5 says that you, "The employee,"

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1 that's you, "employee," not 1099, "has had no direct  
2 client contact."

3 Was that true when you swore that it was true  
4 by your signature here?

5 A. You're getting the same answer, Mr. Kuntz, the  
6 document speaks for itself.

7 Q. Did Mr. Nunez know that number 5 was a lie  
8 when you swore to it?

9 MR. RODRIGUEZ: Object to the form.

10 THE WITNESS: Document speaks for itself.

11 BY MR. KUNTZ:

12 Q. Okay. And then finally number 6, "Employee  
13 did not receive, disburse, or otherwise handle trust  
14 funds or property."

15 The money that you sent to Mr. Romero, did  
16 that come from a Rodriguez Tramont trust fund at any  
17 point?

18 A. I refer to my statement.

19 Q. Did the money come from the Thaler trust fund  
20 at any point?

21 A. Same continuing response.

22 Q. Okay. One last try, is that your signature?

23 A. Same continuing response.

24 Q. Got it.

25 And that continuing response goes all the way



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1 back to the beginning of the deposition, you refuse to  
2 answer on the grounds that you have protections under  
3 the Constitution of Peru, correct?

4 A. You can have the court reporter read back what  
5 I read.

6 Q. Okay. I don't think we need to.

7 MR. KUNTZ: So at this point we're going to  
8 recess but not adjourn. The reason we're recessing  
9 and not adjourning is twofold, Mr. Halpren,  
10 Mr. Rodriguez. With regard to the claim of work  
11 product privilege, because those aren't resolved,  
12 I'm going to reserve my right to continue the  
13 deposition as needed to inquire about any documents  
14 that I'm later given access to.

15 Second of all, Mr. Careaga, with regard to  
16 your deposition here today, I believe that you are  
17 invocation of the Peruvian Constitution to refuse  
18 my -- to refuse to answer nearly all but not all of  
19 my questions is entirely improper. I believe that  
20 to the extent that it could possibly be proper,  
21 you've waived that right by answering some of my  
22 questions. So we're going to go to the court and  
23 talk to her about whether we can get you to answer  
24 my questions or not. Hence, my need to formally  
25 say we're not adjourning, we are merely recessing.

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1 With that I don't have anything further.

2 Any questions from anybody else?

3 MR. RODRIGUEZ: No questions.

4 MR. KUNTZ: Mr. Halpren? Mr. Halpren?

5 We've lost him.

6 While we wait for Mr. Halpren, Mr. Careaga,  
7 you have the right to read or waive reading of your  
8 transcript. Which would you like to do?

9 THE WITNESS: I will read.

10 MR. KUNTZ: Thank you very much.

11 We are concluded for the day on the terms that  
12 I set forth.

13 THE COURT REPORTER: I'm going to need your  
14 e-mail address, please.

15 THE VIDEOGRAPHER: Off record 4:05 p.m.

16 THE WITNESS: Victoracareaga23@gmail.com.

17 THE COURT REPORTER: And your address.

18 THE WITNESS: It's a P.O. Box.

19 P.O. Box 226531, Doral, 33122 -- 33222.

20 MR. RODRIGUEZ: If counsel orders a copy,  
21 which indicated he will -- I'm sorry.

22 If he orders the transcript, I want a copy.

23 THE COURT REPORTER: Mr. Halpren, this is the  
24 court stenographer, would you like to order a copy?

25 MR. HALPREN: Yes, please.

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(The deposition is in recess at 4:05 p.m.)  
(Reading and signing of the deposition was not  
waived by the witness and all parties.)

Victor Careaga  
August 10, 2023

CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF MIAMI-DADE

I, LAURIE K. BELLE, Stenographer and  
Notary Public, State of Florida, certify that VICTOR  
CAREAGA personally appeared before me on Thursday, the  
10th day of August 2023, and was duly sworn.

Signed this 14th day of August 2023.



LAURIE K. BELLE, Stenographer  
Notary Public, State of Florida  
Commission No.: GG 908690  
Commission Expires: October 19, 2023



Victor Careaga  
August 10, 2023

## 1 CERTIFICATE OF REPORTER

2 STATE OF FLORIDA

3 COUNTY OF MIAMI-DADE  
4

5 I, LAURIE K. BELLE, Stenographer, certify  
6 that I was authorized to and did stenographically report  
7 the deposition of VICTOR CAREAGA, pages 1 through 234;  
8 that a review of the transcript was requested; and that  
9 the transcript is a true record of my stenographic  
10 notes.

11 I further certify that I am not a  
12 relative, employee, attorney, or counsel of any of the  
13 parties, nor am I a relative or employee of any of the  
14 parties' attorneys or counsel connected with the action,  
15 nor am I financially interested in the action.

16  
17 Dated this 14th day of August 2023.  
18  
19  
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21   
22  
23

24 LAURIE K. BELLE, Stenographer  
25

Victor Careaga  
August 10, 2023

WITNESS NOTIFICATION LETTER

Monday, August 14, 2023

VICTOR CAREAGA  
P.O. Box 226531,  
Doral, Florida 33222

E-mail: Victoracareaga23@gmail.com

In Re: Application of the Renco Group, et al.  
Deposition of VICTOR CAREAGA  
Taken on 8/10/2023  
U.S. Legal Support Job No. 6414064-001

The transcript of the above proceeding is now  
available for your review.

Please call 305-373-8404 to schedule an  
appointment between the hours of 9:00 a.m. and 4:00  
p.m., Monday through Friday, at a U.S. Legal Support  
office located nearest you.

Please complete your review within a reasonable  
amount of time.

Very truly yours,



LAURIE K. BELLE, Stenographer  
U.S. Legal Support  
16825 Northchase Drive  
Suite 800  
Houston, Texas 77060  
(305) 373-8404  
SouthEastProduction@USLegalSupport.com

CC: Via Transcript

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IN RE: Application of the Renco Group, et al.  
VICTOR CAREAGA  
8/10/2023  
U.S. Legal Job No. 6414064-001

[illegible]

Under penalties of perjury, I declare that I have read the foregoing document and that the facts stated in it are true and correct.

Witness Name

Victor Careaga  
August 10, 2023

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